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AUTHOR	Anderson, Leslie M.; And Others
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ABSTRACT

The Stewart B. McKinney Homeless Assistance Amendments Act of 1990 authorizes the U.S. Department of Education to review state plans submitted under the Act to evaluate whether they adequately address the problems of homeless children and youth relating to access to education and placement. Policy Studies Associates conducted a study of the McKinney program for the Department of Education, surveying state coordinators in all 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs and conducting site visits to 6 state educational agencies and 8 school districts, along with analysis of state plans submitted to the department. It was found that almost all states have revised their laws, regulations, and policies to improve access to education for homeless students, but they still struggle to provide access and to meet health and safety requirements. States and school districts have few resources to meet transportation needs of these students, and housing authorities often do not, or are not able to, consider the educational needs of homeless students. Policy implications of survey findings are explored. (Contains 4 figures, 9 tables, and 11 references.) (SLD)

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An Evaluation of State and Local Efforts to Serve the Educational Needs of Homeless Children and Youth

Leslie M. Anderson
Matthew I. Janger
Karen L. M. Panton

1995

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ANALYSIS AND HIGHLIGHTS

An Evaluation of State and Local Efforts to Serve the Educational Needs of Homeless Children and Youth

Background

The Stewart B. McKinney Homeless Assistance Amendments Act of 1990 authorizes the U.S. Department of Education to review state plans submitted under the Act to "evaluate whether State laws, policies, and practices . . . adequately address the problems of homeless children and homeless youth relating to access to education and placement" and to gather information to "determine the extent.to which State educational agencies are ensuring that each homeless child and homeless youth has access to a free appropriate public education."

Policy Studies Associates has conducted a study of the McKinney program for the Department. Findings are based on a survey of state coordinators in all 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs, and site visits to six state educational agencies and eight school districts, along with an analysis of state plans submitted to the Department.

Key Findings

State Legislative and Policy Responses to McKinney Act Requirements

- *Almost all states have revised their laws, regulations, and policies to improve access to education for homeless students.*

  They report a high level of success in identifying and eliminating barriers once posed by policies on residency and school records.

- *However, states and districts still struggle to provide access while meeting guardianship and immunization requirements (which raise sensitive health and safety issues).*

  To fight disease, most states (42) retain immunization requirements for all students. The extent to which these states are able to enroll homeless children and youth largely depends on the effectiveness of state and local methods for providing immunizations or obtaining these records for homeless students.

  To protect children's safety and welfare (and to avoid liability), schools require a legal guardian's permission for many enrollment and education decisions. Few states set aside these requirements entirely, instead making special allowances for homeless students.

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Barriers remain when children are not identified as homeless or when special allowances are not made at the district or school level.

- *States and districts have few resources to address transportation needs.*

  Site visit data suggest that homeless students are rarely placed in their school of origin, particularly when it would require transportation across district lines. The McKinney program does help transport shelter-based homeless students to *a* school; before McKinney, some homeless students had no access to any school transportation services.

McKinney Act Subgrants: Projects at the District Level

- *A large percentage of state grant funds are used for subgrants to districts.*

  States awarded an average of 71 percent of their McKinney Act grant funds for 1993-94 to local educational agencies (LEAs); subgrant funds went to 3 percent of LEAs nationwide, the majority (51 percent) to urban LEAs.

- *Subgrants support a variety of activities.*

  Subgrant activities included: before- and after-school education projects; awareness raising and sensitivity training; coordination among local service providers; transportation to school; parent involvement; identification and school placement of homeless children; and improving access of homeless children and youth to educational programs and services.

Additional Challenges

- *Homeless youth face extreme barriers to school access.*

  Efforts to curb crime or ensure school safety may impede enrollment for homeless teens—for example, curfew laws make them guilty of a crime just because they have no place to go. Schools in some states refuse to admit homeless teens due to liability concerns. Unlike younger children, teens may be placed statewide, with up to six or seven moves a year disrupting learning. In terms of McKinney-funded services, few of the LEAs in the site visit sample provided instructional services to older students.

- *Housing authorities are generally unaware of the importance of considering the educational needs of homeless students when making housing placements.*

- *Although access to school has improved significantly for homeless students under the McKinney Act, a large proportion have difficulty gaining access to specific educational services (e.g., gifted and talented programs, Head Start).*

  These difficulties remain despite state policies promoting such access. Some subgrantees try to ensure access to Chapter 1 (e.g., by tracking students' whereabouts), but few

reported monitoring the access to other services, such as special education, limited English proficiency programs, or Head Start.

- *Family mobility may be the greatest barrier to school success for homeless students.*

  States and districts are just beginning to explore ways to help homeless students continue making progress as they move from school to school.

Policy Implications

While this study was conducted prior to the enactment of the new legislation, many of the findings point to situations that policymakers still need to address.

Access

- *Homeless students in different districts within the same state often have uneven access to educational services. This situation can be addressed at the state, district, and school level.*

  State policies exempting homeless students from enrollment requirements do not eliminate barriers unless schools and districts are aware of and enforce these policies. State coordinators could help improve these situations by giving technical assistance and information on promising practices to all districts.

- *State policies favoring access for homeless students to federally-funded educational services are not sufficient in themselves to guarantee that access for eligible students.*

  Federal officials can provide guidance to state coordinators on ways to monitor and increase access. Also, federal program guidelines could give priority on waiting lists to homeless students.

- *Considering the unmet needs of homeless youth when targeting McKinney resources and developing programs for homeless students, along with better coordination among state and local agencies, may reduce some of the educational barriers homeless youth confront.*

- *Complying with the McKinney Act's school-of-origin provision may not be feasible for states and districts without additional transportation resources.*

  However, in many cases they have not exhausted all other avenues to find alternate solutions. For example, collaboration with shelter placement agencies may ensure that students are placed near their school of origin or near school bus routes or public transportation services.

Coordination With Other Agencies

- *Housing authorities must be made aware of the need to consider educational needs when making housing placement decisions, particularly for students with disabilities.*

If state and federal officials review the policies of other government agencies (e.g., housing, health and human services), they may identify additional impediments to school access for homeless children and youth.

School Success

- *Focusing more attention and resources on addressing the negative effect of family mobility on students' academic progress may improve homeless students' school success.*

Resources

- *State coordinators should more strongly consider the needs of districts that have not received McKinney subgrants when allocating time and resources.*

- *State coordinators could do more to build links among the countless public and private state and local groups and agencies that serve homeless children and youth.*

Because McKinney funds are small relative to the size of the homeless student population, the funds might best serve to leverage the blending of resources and information among service providers to better address the educational needs of homeless children and youth. For example, officials should weigh the value of district liaisons, who coordinate among local providers serving homeless students, when planning McKinney-funded services. Supporting these liaisons may be the most efficient use of funds.

Additional copies are available from the Planning and Evaluation Service, U.S. Department of Education, 600 Independence Ave., SW, Room 4162, Washington, DC 20202-8240 or (202) 401-0590.

EXECUTIVE SUMMARY

The 1987 Stewart B. McKinney Homeless Assistance Act was enacted to confront the problems of homelessness in this nation. Subtitle VII-B of the Act, as amended in 1990, mandates state action to ensure that homeless children and youth[1] have access to a free, appropriate, public education. Through a combination of methods, including a review of state plans and progress reports, a survey of all state coordinators of education of homeless children and youth, and site visits to a sample of six state education agencies (SEAs) and eight local school districts, this study has investigated (1) the extent to which states have successfully removed the barriers that impede homeless students' access to a free, appropriate education, and (2) how states and school districts use McKinney Act funds to address the educational needs of homeless children and youth[2].

Key Findings

State Legislative and Policy Responses to McKinney Act Requirements

- ***Almost all states have revised their laws, regulations, and policies to improve access to education for homeless students.***

  They report a high level of success in identifying and eliminating barriers once posed by policies on residency and school records.

- ***However, states and districts still struggle to provide access while meeting guardianship and immunization requirements (which raise sensitive health and safety issues).***

  To fight disease, most states (42) retain immunization requirements for all students. The extent to which these states are able to enroll homeless children and youth largely depends on the effectiveness of state and local methods for providing immunizations or obtaining these records for homeless students.

  To protect children's safety and welfare (and to avoid liability), schools require a legal guardian's permission for many enrollment and education decisions. Few states set aside these requirements entirely, instead making special allowances for homeless students. Barriers remain when children are not identified as homeless or when special allowances are not made at the district or school level.

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[1] In general, homeless youth are defined by state coordinators as children between the ages of 12 and 17.

[2] This report is based on the provisions of the McKinney Act in effect prior to changes made by the Improving America's Schools Act (IASA) of 1994.

- ***States and districts have few resources to address transportation needs.***

  Site visit data suggest that homeless students are rarely placed in their school of origin, particularly when it would require transportation across district lines. The McKinney program does help transport shelter-based homeless students to *a* school; before McKinney, some homeless students had no access to any school transportation services.

McKinney Act Subgrants: Projects at the District Level

- ***A large percentage of state grant funds are used for subgrants to districts.***

  States awarded an average of 71 percent of their McKinney Act grant funds for 1993-94 to local educational agencies (LEAs); subgrant funds went to 3 percent of LEAs nationwide, the majority (51 percent) to urban LEAs.

- ***Subgrants support a variety of activities.***

  Subgrant activities included: before- and after-school education projects; awareness raising and sensitivity training; coordination among local service providers; transportation to school; parent involvement; identification and school placement of homeless children; and improving access of homeless children and youth to educational programs and services.

Additional Challenges

- ***Homeless youth face extreme barriers to school access.***

  Efforts to curb crime or ensure school safety may impede enrollment for homeless teens—for example, curfew laws make them guilty of a crime just because they have no place to go. Schools in some states refuse to admit homeless teens due to liability concerns. Unlike younger children, teens may be placed statewide, with up to six or seven moves a year disrupting learning. In terms of McKinney-funded services, few of the LEAs in the site visit sample provided instructional services to older students.

- ***Housing authorities are generally unaware of the importance of considering the educational needs of homeless students when making housing placements.***

- ***Although access to school has improved significantly for homeless students under the McKinney Act, a large proportion have difficulty gaining access to specific educational services (e.g., gifted and talented programs, Head Start).***

  These difficulties remain despite state policies promoting such access. Some subgrantees try to ensure access to Chapter 1 (e.g., by tracking students' whereabouts), but few reported monitoring the access to other services, such as special education, limited English proficiency programs, or Head Start.

- ***Family mobility may be the greatest barrier to school success for homeless students.***

  States and districts are just beginning to explore ways to help homeless students continue making progress as they move from school to school.

Policy Implications

While this study was conducted prior to the enactment of the new legislation, many of the findings point to situations that policymakers still need to address.

<u>Access</u>

- ***Homeless students in different districts within the same state often have uneven access to educational services. This situation can be addressed at the state, district, and school level.***

  State policies exempting homeless students from enrollment requirements do not eliminate barriers unless schools and districts are aware of and enforce these policies. State coordinators could help improve these situations by giving technical assistance and information on promising practices to all districts.

- ***State policies favoring access for homeless students to federally-funded educational services are not sufficient in themselves to guarantee that access for eligible students.***

  Federal officials can provide guidance to state coordinators on ways to monitor and increase access. Also, federal program guidelines could give priority on waiting lists to homeless students.

- ***Considering the unmet needs of homeless youth when targeting McKinney resources and developing programs for homeless students, along with better coordination among state and local agencies, may reduce some of the educational barriers homeless youth confront.***

- ***Complying with the McKinney Act's school-of-origin provision may not be feasible for states and districts without additional transportation resources.***

  However, in many cases states and districts have not exhausted all other avenues to find alternate solutions. For example, collaboration with shelter placement agencies may ensure that students are placed near their school of origin or near school bus routes or public transportation services.

Coordination With Other Agencies

- ***Housing authorities must be made aware of the need to consider educational needs when making housing placement decisions, particularly for students with disabilities.***

  If state and federal officials review the policies of other government agencies (e.g., housing, health and human services), they may identify additional impediments to school access for homeless children and youth.

School Success

- ***Focusing more attention and resources on addressing the negative effect of family mobility on students' academic progress may improve homeless students' school success.***

Resources

- ***State coordinators should more strongly consider the needs of districts that have not received McKinney subgrants when allocating time and resources.***

- ***State coordinators could do more to build links among the countless public and private state and local groups and agencies that serve homeless children and youth.***

  Because McKinney funds are small relative to the size of the homeless student population, the funds might best serve to leverage the blending of resources and information among service providers to better address the educational needs of homeless children and youth. For example, officials should weigh the value of district liaisons, who coordinate among local providers serving homeless students, when planning McKinney-funded services. Supporting these liaisons may be the most efficient use of funds.

Overview

Operating at an annual funding level of $25 million (FY 1993-94), Subtitle VII-B of the McKinney Act is a relatively small program with broad provisions, goals, and objectives. The Act requires states to establish an Office of the State Coordinator of Education of Homeless Children and Youth, and it requires each state that receives McKinney funds to:

- Review and revise state laws, policies, rules, and regulations that may act as barriers to the enrollment, attendance, and success in school of homeless children and youth

- Identify, track, and determine the needs of homeless children and youth

- Raise awareness among communities regarding the definition, condition, needs, and rights of homeless children and youth
- Promote coordination and collaboration at the local level, as well as communicate and coordinate activities with those local education agencies (LEAs), agencies, and organizations that serve homeless children and youth
- Improve the access of homeless children and youth to educational programs and services, including Chapter 1 and Head Start
- Identify local needs and ensure LEA compliance with the requirements of the Act
- Administer McKinney subgrants to LEAs

On average, states[3] received approximately $459,000 in McKinney funding in FY 1993-94, the majority of which was transferred to LEAs through McKinney Act subgrant awards[4].

Despite having little funding and few staff[5] with which to attend to the many requirements defined in the Act, state coordinators for homelessness issues and local McKinney Act subgrant projects have accomplished a great deal. In their state plans and progress reports the states have asserted that, with few exceptions, they have reviewed and revised their laws, regulations, and policies to remove obstacles to the education of homeless children and youth. Data gathered in this study generally confirm that states have successfully reduced many of the most egregious legislative barriers to enrollment posed by state policies on residency, school records, immunization, guardianship, and transportation. Overall, since the passage of the McKinney Act in 1987, fewer legislative restrictions bar school access for homeless youngsters; more schools have identified and enrolled homeless children and youth; and state officials and local service providers are better aware of the problems confronting these youngsters.

When identifying ways to use McKinney resources to serve homeless children and youth, most state coordinators and local liaisons for homelessness issues appear to view McKinney as a

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[3] In this report, the term "state" refers to the 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs, for a total of 53 possible respondents to the survey.

[4] According to the data provided by 47 of the 52 survey respondents, states awarded an average of 71 percent of their McKinney Act grant allocations to LEAs in FY 1994.

[5] The position of state coordinator of education of homeless children and youth is typically a part-time position; nearly one-half of all state coordinators surveyed work 20 hours or fewer per week in the capacity of homeless coordinator.

federal categorical program that offers funds earmarked to support direct services and activities for a particular student population. However, the funds are small relative to the size of the population. As a result, although McKinney legislative reforms have affected many homeless children and youth, the proportion of these youngsters who are benefiting from McKinney-funded special programs and services is probably not great. At the same time, countless state and local organizations and agencies, both public and private, make up the system of services for homeless children and youth; state coordinators could do more to build stronger programmatic linkages among those state and local groups. In fact, McKinney funds might best serve as seed money to leverage the blending of resources and information among members of the service provider community so as to better serve the educational needs of homeless children and youth.

The following sections highlight the study findings with regard to (1) state legislative responses to McKinney Act requirements, and (2) state and local use of McKinney funding to provide special programs and services to homeless children and youth. Each section concludes with a set of policy implications. For the most part, the policy implications focus on ways that states and local school districts can take greater advantage of existing resources and services--through coordination and collaboration--to meet the educational needs of homeless children and youth.

State Legislative and Policy Responses to the McKinney Act Requirements

In passing the McKinney Act, Congress recognized that, in addition to the already formidable personal concerns of homeless people, many school policies present obstacles to school participation for homeless children and youth. Because many of these policies originate at the state level, the McKinney Act, as amended, requires that states review and revise their attendance laws and "other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and homeless youth" (McKinney Act, Section 721). In particular, attention has focused on the barriers posed by state policies on residency, school records, immunization, guardianship, and transportation. Before passage of the McKinney Act, past policies in each of these areas effectively denied many homeless children and youth access to public education.

With few exceptions, states have reviewed and revised their laws, regulations, and policies to remove obstacles to the education of homeless children and youth. They report a high level of success in identifying and eliminating those barriers once posed by policies on residency and school records. In all policy areas, while some states have established new policies, others have created special exemptions from existing policies for homeless children and youth.

States and school districts are still struggling to find ways to guarantee homeless students' access to school while still meeting immunization and guardianship requirements; they also have difficulty finding the resources to address transportation needs. They struggle largely because these issues are sensitive and complicated in that they are related to health, resources, and safety concerns. The following summarizes the areas where states have had difficulty revising state policies that create barriers to school access for homeless children and youth.

Immunization Requirements

Because immunization requirements serve to fight disease, they remain in effect, unlike residency and records requirements. Most states (42), in fact, require all students to be immunized to enroll. The extent to which states are able to enroll homeless children and youth, yet still comply with immunization laws, largely depends on the effectiveness of state and local methods for providing immunizations or obtaining immunization records for homeless children and youth. Fifteen state coordinators report that immunization requirements currently pose an enrollment barrier for homeless children and youth. Some state coordinators cite federal immunization requirements enforced by the U.S. Department of Health and Human Services (HHS) as the reason why schools continue to refuse or delay enrollment of unimmunized homeless children and youth; in their opinion, HHS requirements conflict with the intent of the McKinney Act.

Guardianship Requirements

For the safety and welfare of children, and to protect themselves from liability, schools require a parent's permission for many enrollment and education decisions. As a result, few states set aside guardianship requirements entirely. Instead, many make special allowances that enable homeless children and youth to enroll without a legal guardian. Guardianship policies may still present barriers when children are not identified as homeless or when special allowances are not made at the district or school level. Altogether, 15 state coordinators report that guardianship requirements currently pose an enrollment barrier for homeless children and youth.

Transportation

Transportation is the major enrollment barrier currently facing homeless children and youth. Three factors combine to make school transportation an intractable problem for states. First, school

transportation is primarily a local issue. Second, the provision of transportation for homeless children and youth often requires significant new resources. Finally, family mobility often makes the logistics of transportation difficult. Further, states may not have been forceful in mandating that districts provide transportation to school for homeless children and youth because they cannot provide the funding to implement that mandate. Consequently, complying with the provision of the Act that states that the best interest of the child must be considered in making school placement decisions--even if it requires returning the child to his or her school of origin--is difficult. Site visit data suggest that these decisions rarely result in returning homeless students to their school of origin. Nevertheless, McKinney funds and services have helped shelter-based children and youth obtain transportation services to a school, albeit not usually their school of origin.

Policy Implications

- Making special exceptions for homeless students, as opposed to introducing laws that exempt all children from particular school enrollment requirements, does not eliminate barriers unless awareness is raised regarding the existence of these special exceptions. Moreover, homeless children and youth may have difficulty reaping the benefits of these special policies if they are not identified as being homeless or if districts neglect to apply a policy.

- Program requirements and policies under the purview of different federal and state agencies sometimes directly contradict the requirements of the McKinney Act. The relevant federal departments could help state coordinators and local school district officials lessen the confusion by working together and clarifying which policies and program requirements take precedence. Further, by broadening the review process to include the policies of other government agencies, including housing and health and human services, state coordinators--and federal officials--may identify additional policies that impede efforts to ensure school access for homeless children and youth[6].

- Although most state coordinators argue that McKinney should allow more flexibility in the way they apportion their McKinney funds--so that they can spend more than 50 percent of their grant allocation on transportation services[7]--states and school districts have not exhausted all other avenues in searching for ways to return a homeless student to his or her school of origin when it is deemed in the best interest of the child. For example,

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[6] According to the McKinney Act, as amended by IASA, the state coordinator shall "facilitate coordination between the State educational agency, the State social services agency, and other agencies providing services to homeless children and youth, including children and youth who are preschool age, and families of such children and youth" [Section 722 (f)(5)].

[7] In fact, the McKinney Act, as amended by IASA, eliminates the distinction between "primary" and "related" activities. LEAs may now expend subgrant funds on any activities to carry out the purpose of the Homeless Children and Youth Program [Section 723 (d)].

collaborating with agencies that determine shelter placements may help ensure that school-age homeless students are placed in shelters closer to their school of origin, or at least closer to school bus routes or public transportation services. In the event that these options fail, however, complying with the school-of-origin provision of the Act may not be feasible for states and local school districts without additional resources.

- School districts' limited efforts to transport homeless students to their schools of origin (when it is deemed to be in a student's best interest) suggest that the language of the McKinney Act may be unclear. Local school district administrators may view the reference to the "comparable services"[8] condition in the law as justification for failing to transport homeless children and youth to their schools of origin, particularly when it would require transporting these youngsters across district lines.

McKinney-Funded Services and Activities to Meet the Educational Needs of Homeless Children and Youth

Identification and Tracking of Homeless Children and Youth

Locating homeless children and youth is often difficult, and although states and local school districts are getting better at it, the data are still prone to inaccuracies such as undercounts or double-counted individuals. In particular, state coordinators struggle to identify homeless children and youth when they live on the streets, in cars, in abandoned buildings, or doubled-up with relatives or friends; or when they disguise the fact that they are homeless out of embarrassment or fear that revealing their status will result in local authorities intervening and separating family members. State difficulties in identifying homeless children and youth are also attributable to school districts' lack of awareness that homeless families live in their communities. Finally, the practice of placing families in hotels and motels when the shelters are full--a fairly common practice in large cities with large homeless populations--also impedes identification and tracking. Usually, if homeless children and youth are not in the shelters or schools, they are not identified and are effectively not in the system. Currently, what state coordinators know about homeless children and youth is the following:

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[8] The 1990 law required that "Each homeless child shall be provided services comparable to services offered to other students in the school selected according to the provisions of paragraph (3), including transportation services, educational services for which the child meets the eligibility criteria, etc." [1990 McKinney Act, Section 722 (e)(5)]. The current law, as amended in IASA, is virtually unchanged regarding the comparable services provision: "Each homeless child or youth to be assisted under this subtitle shall be provided services comparable to services offered to other students in the school selected according to the provisions of paragraph (3), including. . . " [1994 McKinney Act, Section 722 (g)(4)].

- The average school attendance rate for identified homeless students in elementary, middle, and high schools is 86 percent.

- Identified homeless children and youth who are enrolled in school are found at all grade levels; 30 percent are pre-K, 36 percent are at the elementary level, 16 percent are at the middle school level, and 18 percent are at the high school level.

States vary greatly in the methods they use for identifying, tracking, and determining the needs and condition of homeless children and youth, and in the quality of the data they collect[9]. In particular, although some methods of data collection yield incomplete and generally inaccurate data, several states continue to use them. Examples of such methods are one-night counts in shelters only and longer-term direct counts in shelters only[10]. In fact, the relative success of a state's or school district's identification process depends on the willingness and ability of a variety of noneducation institutions and agencies to provide accurate data. Many shelter providers do not keep data on the number of children served, their ages, their school status, or other pertinent information. In addition, shelter providers, already overwhelmed by the other demands that are placed on them, are sometimes frustrated at being asked to participate in an identification and tracking program. The successful identification of homeless students also depends on the willingness and ability of school personnel to determine students' status, not only when they initially enroll, but throughout their school career because students may become homeless at any time.

Improving Access to Educational Programs and Services

Despite significant progress in the numbers of identified homeless children and youth gaining access to school since the passage of the McKinney Act, a large proportion of these youngsters still experience difficulty in gaining access to needed educational services such as gifted and talented

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[9] Under the new legislative requirements under IASA, state coordinators are no longer required to gather data on the number and location of homeless children and youth every two years. Rather, every three years, state coordinators are required to "gather, to the extent possible, reliable, valid, and comprehensive information on the nature and extent of the problems homeless children and youth have gaining access to public preschool programs and to public elementary and secondary schools, the difficulties in identifying the special needs of children and youth, any progress made by the SEA and LEA in the state in addressing such problems and difficulties, and the success of the program under this subtitle in allowing homeless children and youth to enroll in, attend, and succeed in, school" [Section 722 (f)(2)].

[10] "One-night counts" refer to the number of homeless children and youth living in shelters on a single night. "Direct counts" refer to actual counts rather than estimates of the number of homeless children and youth.

programs and Head Start. Moreover, many state coordinators do not even know whether problems of access to particular services exist. Ensuring access to educational services such as Chapter 1, Head Start, and special education did not appear to be a high-priority activity among many state coordinators with whom we spoke. For some state coordinators, it is a matter of limited resources. Most of their time and energy are already consumed with just getting homeless children and youth into school; the nature and quality of the services these students receive once they have arrived at school is viewed as a secondary issue--if it is even considered at all.

Other situations that impede access to school and to needed educational services and activities include the effect of the homelessness crisis on the parents of homeless children and youth. That is, parents typically want their children nearby throughout their homelessness crisis and may thus be averse to enrolling them in school. In fact, parents often fear schools as threats to family survival--they sometimes believe the schools will report their living situation to a child service agency that would subsequently take their children away--and often do not encourage their children to attend while they are homeless.

Finally, homeless youth, as distinct from homeless children, are among the most disenfranchised segment of the homeless population. They rarely attend school because of guardianship and housing issues and have few educational or social services available to them. Nevertheless, most state coordinators and local school districts with McKinney subgrants choose to fund services targeted to homeless children.

Awareness Raising and Sensitivity Training

Communities differ in their awareness of issues related to the definition, condition, needs, and rights of homeless children and youth. Reflecting these differences, the amount of time that state coordinators and local liaisons for homelessness issues spend on awareness-raising activities varies. In any case, there is no guarantee that those who most need education on issues related to homeless children and youth actually learn to adjust their attitude and behavior. In fact, evidence suggests that local awareness raising has yet to eliminate insensitivity toward homeless children and youth in the schools. Liaisons for homelessness issues reported incidents of insensitivity and unnecessary enrollment delays in schools, despite their efforts to sensitize school staff to the needs of homeless students. Evidence from the site visits also suggests that focusing awareness raising on just school administrators, teachers, and homeless parents may not be enough. Community members and parents of nonhomeless students also have to be educated about the needs of homeless children and youth residing in the community.

Finally, housing authorities are simply not aware of the importance of considering the educational needs of homeless children and youth when making housing-placement decisions. Families placed in hotels and motels have access to fewer services than are available in shelters and other temporary housing facilities. For example, hotels and motels, unlike public shelters, generally have no clinic for immunizations and no case workers to ensure that children are enrolled in and attending school. Lacking the rules and resources of the shelters, many children living in hotels or motels do not attend school. In addition, students with special needs are sometimes placed in shelters without regard to whether local schools will be able to serve their needs[11].

Identifying Local Needs

Districts that do not have McKinney subgrants receive much less individual attention and support from the state coordinator than those that have received funding, according to the state coordinators visited in this study. Time pressures, limited resources, and other administrative responsibilities make it impossible for state coordinators to monitor the activities of even a few school districts regularly, especially those in remote areas with fewer homeless students. In interviews, state coordinators explained that they only learn about local noncompliance with McKinney when there is a complaint. In fact, few state coordinators in our site visit sample appeared to have a system for monitoring local compliance and identifying local needs.

Policy Implications

- Because homeless children and youth may not receive the services and support they need if they go unidentified, state coordinators need technical assistance and training in ways to design and implement effective and efficient systems for data collection. In addition, state coordinators need to work more closely with other agencies and organizations that serve homeless populations in order to better ensure that all homeless children and youth are identified and served.

- Although states may have policies and laws declaring that access should not be denied, this does not guarantee that homeless children and youth have access to the educational programs for which they are eligible. The relevant federal departments could help state coordinators by suggesting ways to increase and monitor homeless

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[11] The new legislation requires states "to develop and implement professional development programs for school personnel to heighten their awareness of, and capacity to respond to, the specific problems of homeless children and youth" [Section 722 (d)(5)].

students' access to federally funded educational programs and services. In addition, federal program guidelines could give priority to homeless children and youth on waiting lists. Finally, raising the awareness of relevant program administrators regarding the needs of homeless students and coordinating activities with them may help ensure the access of homeless children and youth to Chapter 1, Head Start, special education, and other educational services.

- Parent-involvement activities for parents who are homeless can be extremely important to the success of state and local efforts to ensure school access, attendance, and success for homeless children and youth. School districts can encourage parents to participate in education-related activities to help them feel comfortable in the school setting and help them set an example for their children regarding the value of education.

- Considering the unmet needs of homeless youth when targeting McKinney resources and developing programs, services, and activities for homeless students may help eliminate some of the educational barriers homeless youth confront. In addition, more attention to coordinating and collaborating with state and local service agencies and organizations that work with homeless or runaway youth is likely to improve identification and placement problems for this population.

- The absolute number of homeless children and youth who are benefiting from special programs and services under subgrants is probably not great. More districts with homeless populations need to be made better aware of the needs of homeless children and youth and receive adequate support from the state in order to ensure that more homeless students obtain a free, appropriate education.

- Housing authorities need to be made better aware of the importance of considering the educational needs of homeless children and youth when making housing-placement decisions. In particular, in the case of special needs students (e.g., with physical or learning disabilities), housing authorities must consider whether local schools can serve the students' needs. This issue requires coordination at the state and local level with regard to housing policies and educational needs[12].

- State and local administrators and service providers must recognize that awareness raising and sensitivity training are never-ending tasks. As teachers, principals, and state and local administrative personnel enter and leave their positions, state coordinators and local liaisons for homelessness issues must regularly visit schools and state and local agencies and inform the current staff of the educational rights and needs of homeless children and youth. Moreover, state coordinators and local subgrantees who raise awareness in communities may, in so doing, overcome

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[12] The McKinney Act, as amended by IASA, now requires states and McKinney subgrantees to "coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in Section 105 of the Cranston-Gonzalez National Affordable Housing Act to minimize educational disruption for children who become homeless" [Section 722 (g)(9)].

nonschool barriers to school access and success for homeless children and youth. For districts without subgrants, which seldom have designated liaisons for homelessness issues, the state coordinator must play the role of liaison and sponsor necessary awareness raising and sensitivity training for school personnel.

- State coordinators should more strongly consider the needs of districts that have not received McKinney subgrants when making choices about the allocation of their time and resources. In addition, they should consider working with other programs or agencies to develop a more efficient system for local monitoring and needs assessment. For example, some state coordinators have negotiated the attachment of McKinney-related compliance monitoring and technical assistance to the work of other organizations and agencies (e.g., through surveys, site visits, or other monitoring and technical assistance activities). This type of inter-institutional collaboration is perhaps the most resourceful means by which state coordinators identify local needs and fulfill their responsibilities to homeless children and youth as currently defined under the Act.

McKinney Act Subgrant Projects

The 1990 Amendments to the McKinney Act authorized state education agencies to award McKinney Act grants (often referred to as "subgrants") to local education agencies (LEAs)[13]. The grant awards are intended to support LEAs' efforts to sustain the laws enacted to support the educational needs of homeless children and youth. States awarded an average of 71 percent of their McKinney Act grant allocations for 1993-94 to LEAs; the average grant award was $57,380. Despite the high proportion of McKinney funds flowing through to LEAs, just three percent of LEAs nationwide held McKinney grants (new or continuation) in 1993-94, suggesting that the absolute number of homeless children and youth who are benefiting from special programs and services under subgrants--as opposed to general statewide homeless advocacy efforts--is not very great. In fact, the voluntary nature of the subgrant application process may preclude state coordinators from reaching a broad cross-section of the homeless population in their respective states; few state coordinators could say definitively whether grants generally go to LEAs with the largest numbers of homeless families.

The services and activities to which LEAs apportioned the most McKinney dollars were: (1) before- and after-school tutoring, (2) awareness raising, (3) coordinating and collaborating with other organizations and agencies serving homeless populations, (4) transporting children and youth to

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[13] Alaska, Delaware, New Hampshire, Vermont, and Wyoming are still funded at, or close to, the minimum allocation level ($50,000) and do not have the funds available to award subgrants to LEAs; data from these states are not included in the discussions that follow. The BIA is also excluded because its funding is separately determined.

school, and (5) school supplies. In addition, identification and school placement of homeless children and youth and parent involvement were activities to which many LEA subgrantees in our site visit sample devoted time or apportioned McKinney funds. Few McKinney subgrantees are required by their state coordinators to evaluate their project services and activities. Consequently, few subgrantees in our site visit sample could discuss the degree to which their projects improved the school access, attendance, and success of homeless children and youth.

In every subgrant project in our site visit sample, the liaison for homelessness issues is the staff person responsible for the majority of project operations and administration. In most local sites with subgrants, the district liaison for homelessness issues has primary responsibility for negotiating the network of agencies and social service providers that makes up the "system" of services for homeless children and youth. Knowing and negotiating the system are essential to the position of liaison, if only to prevent service duplication and competition within the network of service providers. Those liaisons who have experience with and strong connections to the service-provider community tend to generate additional resources and support for homeless children and youth. A variety of sources, including state coordinators and local service providers, provide anecdotal evidence to suggest that in those districts that have them, liaisons have generally improved the provision of services to homeless children and youth.

Policy Implications

- Because district liaisons for homelessness issues have generally improved the provision of services to homeless children and youth as well as helped ensure homeless students' access to and attendance in school, funding liaisons for homelessness issues at the local level may be an especially efficient use of McKinney dollars.

- Although evaluation can yield important information about project successes and needs as well as generate additional project support and resources, few LEAs with McKinney subgrants measure program impacts on the academic achievement, attitude, self-esteem, and school access and attendance of homeless children and youth. Most McKinney subgrantees would probably benefit from encouragement and technical assistance with regard to program evaluation.

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I. INTRODUCTION

The 1987 Stewart B. McKinney Homeless Assistance Act was enacted to confront the problems of homelessness in this nation. Subtitle VII-B of the Act, as amended in 1990, mandates state action to ensure that homeless children and youth[1] have access to a free, appropriate, public education.

This study, conducted under a contract with the Office of the Under Secretary, U.S. Department of Education (ED), has evaluated state and local efforts to serve the educational needs of homeless children and youth and has identified barriers that affect these youngsters' enrollment, attendance, and school success. This final report of the study describes and analyzes three important areas of state and local activity: (1) the state's review and revision of laws and policies that might impede homeless students' access to school; (2) the services and activities of the state Office of the Coordinator of Education of Homeless Children and Youth, an office that the McKinney Act established in each state; (3) and the McKinney Act subgrant award process, and how local education agencies (LEAs) with McKinney subgrants supplement the services available to homeless children and youth as well as remove the barriers to their enrollment and success in school. Finally, the report identifies persistent barriers to school enrollment, access, and success for homeless students and explores the implications for federal policy[2].

Overview of Subtitle VII-B of the McKinney Act

The provisions of Subtitle VII-B of the McKinney Act are broad, intended to ensure that: (1) all homeless children and youth have the same right to a free and appropriate public education as nonhomeless children; (2) states review and revise residency laws and "other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and homeless youth"; and (3) students are not separated from the mainstream school environment because of being homeless (McKinney Act, Section 721). Under Section 103(a) of the McKinney Act, children and youth are defined as "homeless" if they lack "a fixed, regular, and

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[1] In general, homeless youth are defined by state coordinators as children between the ages of 12 and 17.

[2] This report is based on the provisions of the McKinney Act in effect prior to changes made by the Improving America's Schools Act (IASA) of 1994.

adequate nighttime residence," or if their primary nighttime residence is: (1) a supervised shelter (e.g., welfare hotel, congregate shelter, runaway shelter, or transitional housing for people with mental illness) designed to provide temporary accommodations; (2) an institution (other than a jail or prison) that provides temporary accommodations for people who are intended to be institutionalized; or (3) a place that has not been designed for, or been ordinarily used as, sleeping accommodations for people. Other categories of children and youth such as migratory children, those living in foster care, children of "doubled-up families" who share a living space, and those who live in trailer parks or camping areas may or may not be classified as homeless. States can assess cases on an individual basis, using criteria such as whether these living arrangements are voluntary.

Authorized State and Local Activities Under the McKinney Act

The 1987 legislation and its 1990 amendments require each state or territory that receives McKinney funds to: adopt a plan for educating its homeless children and youth; establish or designate an Office of the State Coordinator of Education of Homeless Children and Youth; and ensure LEA compliance with the requirements of the Act.

State plans. Among the requirements of the original 1987 legislation are that each state or territory must submit a state plan to ED. The plans serve as a guide for the state education agency (SEA) and its LEAs to follow in addressing the needs of homeless children and youth. The state plans generally include policies, goals, and objectives related to the education of homeless children and youth, as well as the strategies and activities that the state or territory will implement to achieve them. The annual state progress reports submitted to ED detail the major activities that have occurred within the state or territory during the year, describe progress and obstacles encountered in implementing the state plan, and provide information on local projects and programs.

Responsibilities of the state coordinators. Under the Act, state coordinators are responsible for: (1) gathering data once every two years on the number and location of homeless children and youth enrolled in schools in the state and submitting a report to ED[3]; (2) facilitating coordination among agencies, social service providers, and other entities providing services to homeless children, youth, and their families; (3) improving the provision of comprehensive services to homeless

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[3] The McKinney Act, as amended by IASA, now requires state coordinators to estimate the number of homeless children and youth in the state, and the number served with assistance under the Act. Reports containing this data, as well as additional information, must be submitted every three years.

children, youth, and their families by developing relationships and facilitating coordination with other relevant education, child development, or preschool programs; and (4) facilitating the enrollment, attendance, and success of homeless children and youth in school by providing and administering grants to LEAs[4].

To remove and prevent barriers to the enrollment or attendance of homeless children and youth, state coordinators must regularly review rules and procedures issued by LEAs and SEAs. Coordinators must address problems of school enrollment delays caused by transportation problems; immunization requirements; residency requirements; lack of birth certificates, school records or other documentation; or guardianship issues. State coordinators also must ensure that homeless children and youth have access to federal, state, and local before- and after-school programs, extracurricular programs, and food programs. Further, the Act requires coordinators to promptly resolve disputes about the educational placement of homeless children and youth, remove barriers to their enrollment and retention in school, heighten awareness of their needs, and ensure that they are not isolated or stigmatized.

Responsibilities of local education agencies. The law requires that "each plan adopted under [Subsection 722 (e)(2)] shall assure to the extent practicable under requirements relating to education established by state law" that LEAs comply with the following requirements specified under the Act (McKinney Act, Section 722):

- Maintain any student records ordinarily kept by the school, including immunization records, academic records, birth certificates, guardianship records, and evaluations for special services or programs of each homeless child or youth.
- Review and revise policies that may impede homeless students' access to school.
- Allow homeless students to either: (a) continue their education in the "school of origin"--defined as either the school that the child or youth attended when permanently housed or the school where the child or youth was last enrolled--for the remainder of the year (or the following year, should the family become homeless between academic years); or (b) enroll in a school attended by nonhomeless students in the area in which the homeless child lives, whichever is in the child's or youth's best interest. Consideration shall be given to a request made by a parent regarding school selection[5].

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[4] The new legislation also focuses on preschool-age children who are homeless.

[5] Under the new legislation, an LEA must comply, to the extent feasible, with a request made by a parent or guardian regarding school selection.

- Offer those services to homeless students that are offered to nonhomeless students, including transportation services and educational services for which the student is eligible (e.g., Chapter 1, programs for students with limited English proficiency (LEP), programs for gifted and talented students, etc.).

Study Purposes and Design

This study has investigated (1) the extent to which states have successfully removed the barriers that impede homeless students' access to a free, appropriate education, and (2) how states and school districts use McKinney Act funds to address the educational needs of homeless children and youth. Specific questions include the following:

- How have states changed state or local laws, regulations, programs, or policies affecting the education of homeless children and youth? What types of education programs do homeless children and youth have the most difficulty accessing? What efforts has the Office of the Coordinator made to coordinate services and increase linkages and communication among education and noneducation agencies and organizations that serve homeless people, particularly homeless children and youth? What have state coordinators done to support local school districts in their efforts to serve the educational needs of homeless children and youth?

- To what extent have states and selected school districts successfully removed the barriers to the enrollment of homeless children and youth in school? What state policies and practices still impede school access, attendance, and success for homeless children and youth? What do representatives of states recommend as ways to better meet the needs of homeless children and youth?

Data Collection

Data for this study were collected through a combination of methods, including a survey of all state coordinators of education of homeless children and youth and site visits to a sample of six SEAs and eight local school districts. As background data for this report, state plans and progress reports were reviewed regarding efforts to serve the educational needs of homeless children and youth; the review also informed the development of the study questions and data collection instruments. A more detailed description of the data-gathering procedures and instruments follows.

Review of state plans.[6] Although state plans and progress reports repeat the assurances required under the 1990 amendments to the McKinney Act, efforts to identify, enroll, and ensure the continued success of homeless children and youth vary widely across the United States and its territories, both in strategies used and in progress made. The study team analyzed state plans and progress reports and summarized activities that directly address five main areas of concern emphasized in the McKinney Act regulations: (1) access to school, (2) access to educational programs and services, (3) awareness-raising activities, (4) coordination and collaboration, and (5) support to local school districts.

Our review of state plans and progress reports generated preliminary findings that informed the subsequent design of study instruments. Generally, we found state plans and progress reports to be vague about the actual level of implementation, support, and resources channeled into activities for the education of homeless children and youth. In many cases, individual states did not include any detailed information on their activities in one or more of these five areas of interest, or references to activities in these areas were ambiguous, with some states simply reiterating the language of the McKinney Act and their intention to abide by its requirements[7]. In some of their early reports, several states described specific programs that were being considered for future implementation. Later progress reports, however, made no reference to the proposed programs, so it was unclear whether the proposed programs had actually been implemented. Given these ambiguities, the study instruments were designed to distinguish between proposed and existing state and local activities. The state plans and progress reports were also used as a resource for developing survey questions and response categories. Occasionally, this report references data from the state progress reports, particularly with regard to state laws and policies enacted in response to the five main areas of concern highlighted in the McKinney Act.

Survey of state coordinators of education of homeless children and youth. The survey was sent to state coordinators in all 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs (BIA) in the winter of 1994[8]. The survey gathered information from state coordinators

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[6] The review covered the state plans and progress reports of 55 states and territories submitted to ED between 1988 and 1992.

[7] The new legislation addresses this problem by requiring more detail in a state plan, including descriptions of the various procedures and programs a state has adopted to address the Act's requirements [Section 722 (g)(1)].

[8] From this point forward in the report, we refer to all survey respondents as "state coordinators."

about state policies and procedures for the education of homeless children and youth. Information was also gathered on state coordinators' efforts to: (1) identify and track homeless children and youth, (2) identify homeless children's educational needs, (3) coordinate and collaborate with other social service agencies working with the homeless population, (4) provide support to LEAs serving homeless children and youth, and (5) involve homeless parents in the education of their children. Fifty-two state coordinators completed and returned the survey--a response rate of 98 percent.

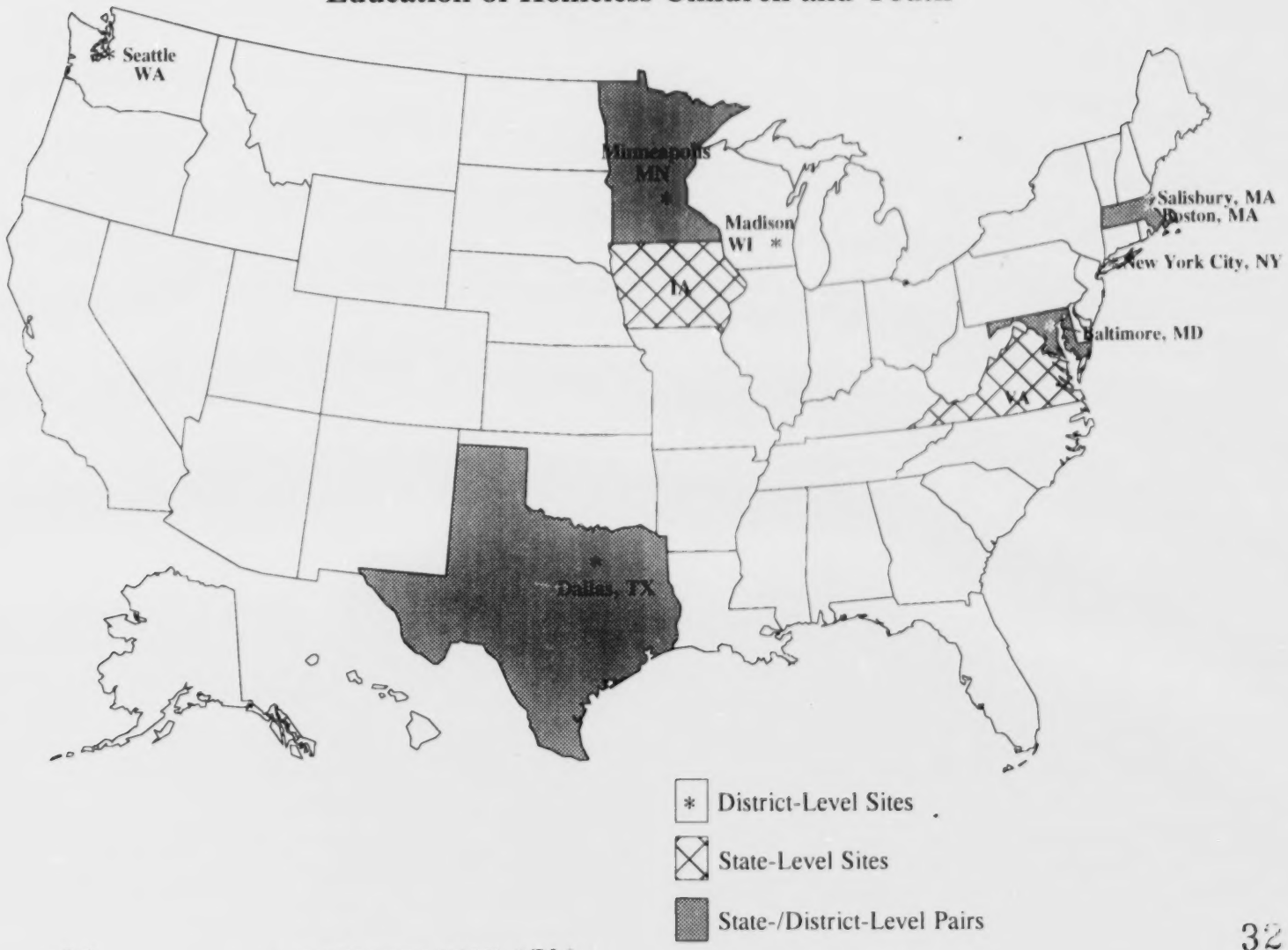
Site visits. To provide illustrative examples of trends that emerged from the nationally representative survey data, we conducted site visits to six SEAs and eight school districts (all McKinney subgrantees) during February and March 1994. The state visits included interviews with SEA and other state government officials as well as representatives of advocacy organizations and other agencies that work with homeless populations. The district visits included interviews with district officials, liaisons for homelessness issues, school principals and teachers, and other local social service providers; we also visited schools and shelters serving homeless children and youth. The samples of states and districts were partially overlapping: In four states, we visited state agencies and one or more districts; in two states we conducted state-level visits but did not gather data from districts; and we visited one district (but no state agencies) in each of three additional states (Figure 1).

Relevant to the education of homeless children and youth, the site-selection process focused on identifying states and school districts that accomplish some or all of the following: (1) ensure school access; (2) provide for homeless children's personal needs; (3) provide instructional support; (4) collaborate with other agencies that provide services to homeless children and youth; (5) raise awareness of the educational and other needs of homeless children and youth; and (6) support local efforts to serve homeless children and youth. Nominations came from Compensatory Education Programs and the Office of the Under Secretary in ED. The National Coalition for the Homeless was also contacted.

Site selection was also based on achieving some distribution among the following demographic variables:

- Geographic region
- Estimated population of homeless children and youth
- Level of project funding
- Size of district or state

Figure 1
Site Visit Sample for the Study of Education of Homeless Children and Youth



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The Condition of Homelessness

The state and local educators who work with homeless children and youth use formal and informal methods of learning about the conditions facing homeless youngsters and their families. By way of background for this study's findings on state and local activities under the McKinney Act, we summarize here the statistics and the more impressionistic observations reported by our survey and interview respondents.

Statistics on Homeless Children and Youth

State coordinators were able to provide us with the following information on homeless children and youth[9]:

- In approximately one-half of the states, most homeless children and youth reside in urban areas. Most state coordinators (45) also reported that less than 25 percent of homeless children and youth in their state live in the suburbs.
- Less than half of all homeless children and youth (45 percent) live in public or privately operated shelters; 56 percent live on the streets, doubled up with relatives or friends, and in other types of settings.
- The average school attendance rate for identified homeless students in elementary, middle and high schools is 86 percent.
- Identified homeless children and youth who are enrolled in school are found at all grade levels: 30 percent are pre-K, 36 percent are at the elementary level, 16 percent are at the middle school level, and 18 percent are at the high school level.

Factors Associated With Becoming Homeless

Reports from states, schools, and social service agencies indicate that there have been "increasing numbers of school-age children from homeless families, particularly female-headed homeless families with young children" (Rafferty, 1991, cited in Markward, 1994). The primary reasons for these increases in homelessness vary from locality to locality; however, the factors

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[9] Much of these data were provided to ED in state biannual status reports for 1993-94. We then created a database that incorporates the status report data on school enrollment, attendance, and living conditions of homeless children and youth. The aggregated numbers are presented here.

described here were frequently identified as contributors to the changing pattern of homelessness in the states and districts we visited.

The first factor is economic hardship. Cutbacks in AFDC payments, rent increases, reductions in the number of affordable housing units, and rising unemployment are among the more common problems cited. Several officials with whom we spoke added that a lack of education and job-related skills among homeless adults, coupled with the simultaneous responsibility of having to care for one or more young children, exacerbates these problems and makes long-term solutions debatable.

Education and social service agency officials also described the interrelationships among worsening economic conditions, domestic violence, and drug and alcohol abuse. They reported that all three--individually and collectively--have been associated with an increase in the number of women, young children, and unattached older youth who have had to leave their homes and compete for limited space in shelters designated for battered women, or in special emergency shelters for runaway youth.

Some small towns and cities close to larger urban areas have experienced an influx of homeless families fleeing crime-ridden communities, many of which are plagued by gang warfare. These "urban refugees," as some local officials refer to them, seek to create a new life in a safer environment with their children. Unfortunately, the social service systems in these smaller communities are overwhelmed by the increased demand for services. In addition, local opposition to the newcomers sometimes develops among those who feel they are being unfairly called on to absorb the costs associated with "solving another city's problems."

Other less frequently reported reasons for homelessness among families include: natural disasters (e.g., floods) that sometimes force families to double up with relatives or friends, and local government actions such as lead-paint-removal programs and condemnation of buildings caused by substandard housing conditions. When alternative affordable housing is not available, entire families may unexpectedly find themselves in shelters or motels, or even on the street.

The Educational and Social Needs of Homeless Children and Youth

Survey reports and interview data suggest that among the most pressing needs that homeless families experience--apart from their obvious immediate need for shelter--are the need for food, clothing, and personal supplies (e.g., soap, toothpaste, comb). In addition, many homeless children

and youth are in poor health and receive inadequate medical care. Close to one-third of state coordinators considered poor health and inadequate health care to be among the top three barriers to school success for homeless children and youth, and 29 state coordinators indicated that, given additional resources, "physical needs" (e.g., food, clothing, and health care) would be among the top three needs on which they would focus their assistance.

According to shelter and school personnel, most homeless children have low self-esteem, and feel embarrassed, angry, afraid, and sad in varying degrees of intensity (Hughes & Borad, 1983; Waxman & Reyes, 1987, in Timberlake & Sabatino, 1994). These feelings are particularly strong in those who are unable to successfully meet the academic and social challenges of the classroom (Timberlake, 1993; Molnar, 1988; Rafferty, 1991). As a result, counseling and other psychological services may be required. High mobility rates and a lack of continuity--between and among different schools, teachers, and subject matter--also obstruct the learning process for homeless children and youth. In fact, 29 state coordinators ranked "frequent mobility from school to school" as the number one barrier to school success.

The absence of other more tangible elements like school supplies also undermines efforts to educate homeless children and youth. Besides having physical and emotional needs, homeless children and youth generally need clothes for school and basic school supplies like notebooks, pens, pencils, and bookbags. This is not only a source of embarrassment for many children; the lack of necessary school materials may prevent homeless students from completing their classwork and homework.

Homeless children and youth represent diverse backgrounds and experiences. As a result, their physical, intellectual, social, and psycho-emotional conditions differ, along with the nature and intensity of their needs. The service-provider community recognizes that schools and other agencies must be adequately prepared--with knowledge, commitment, and resources--to effectively meet the tremendous challenges that these conditions present to the educational process.

The special circumstances surrounding homeless youth. In addition to the above-described physical, emotional, and psychological problems that often accompany homelessness for children, homeless youth (ages 12-17) often must confront the problems of homelessness without the help of a parent or guardian and while living outside the shelter system. In fact, most shelter systems will not accept homeless youths 12 years old and older; limited long-term accommodations in most towns and cities have forced many homeless youth to live on the streets or doubled up with friends. Further, because they are not of legal age and are typically not emancipated from their families, most homeless youth have trouble accessing social service systems. In addition, most homeless youth struggle to

enroll and attend school in the face of transportation needs and guardianship requirements. When they are able to gain access to school, their success is often threatened by the numerous problems they experience, according to MacKay and Hughes (1994), including "anxiety, depression, poor health, drug and alcohol abuse, lack of parental support, and histories of sexual and physical abuse" (p. 57). In addition, new anti-violence legislation (discussed in Chapter V) is emerging in states across the country that will likely further impede school enrollment, attendance, and success for homeless youth. Finally, although homeless youth are among the neediest segments of the homeless population, the organizations and agencies (particularly schools and school districts) that comprise the social service network have largely overlooked homeless youth when identifying needs and targeting services for homeless populations.

Organization of This Report

The remainder of this report is organized into five chapters. Chapter II addresses state policies, rules, and regulations affecting the enrollment, attendance, and success of homeless children and youth. Chapter III discusses the role of the state coordinator regarding identification and tracking activities, awareness-raising efforts, coordination and collaboration with the service-provider community, and support to local education agencies serving homeless children and youth. Chapter IV focuses on the services provided to homeless children and youth through the McKinney Act subgrants to LEAs. Chapter V discusses additional challenges to state and local efforts to remove the barriers that impede homeless students' access to school. Chapter VI presents conclusions and policy implications.

II. STATE LEGISLATIVE AND POLICY RESPONSES TO THE McKINNEY ACT

In passing the McKinney Act, Congress recognized that, in addition to the already formidable personal concerns of homeless people, many school policies present obstacles to school participation for homeless children and youth. Because the source of many of these policies lies at the state level, the McKinney Act, as amended, requires that states review and revise their attendance laws and "other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and homeless youth" (McKinney Act, Section 721). In particular, attention has focused on the barriers posed by state policies on residency, school records, immunization, guardianship, and transportation; prior to the passage of the McKinney Act, policies in each of these areas effectively denied homeless children and youth access to public education.

State plans and progress reports reveal that, with few exceptions, states have reviewed and revised their laws, regulations, and policies to remove obstacles to the education of homeless children and youth. Many states have changed their laws, creating special statutes for homeless children and youth or revising their laws for all children in such a way that schools no longer exclude homeless children and youth. In some cases, a state's policies were already sufficient to allow the enrollment of homeless children and youth, but it was necessary for the state to make new efforts to enforce existing laws, often by reminding the local districts of their responsibilities. In other cases, states have relaxed the enforcement of certain policies--for example, by encouraging districts to be lenient in applying enrollment policies to homeless children and youth.

The survey of state coordinators and the site visits confirmed that states have successfully reduced many of the legislative barriers to enrollment posed by state policies on residency, school records, immunization, guardianship, and transportation. However, the coordinators indicated that the level of success in revising state policies varies among the different enrollment barriers. For each of these areas of state policy, at least some coordinators--ranging from a handful to a majority--reported that state requirements still pose a barrier to the enrollment of homeless children and youth (Table 1).

The following discussion addresses state legislative responses to the McKinney Act. We have divided the discussion of issues into two groups: those issues that generally no longer present enrollment barriers to homeless children and youth, and those that still do, to a lesser or greater degree. It is important to note, however, that although most states have reviewed and revised laws

that create barriers to school enrollment for homeless children and youth, this does not guarantee that homeless children and youth have access to school. Translating state policy into local practice, as we will discuss throughout this report, is a never-ending process fraught with difficulty. One of the most important roles the state coordinator of education of homeless children and youth plays, therefore, is to monitor compliance with federal and state policy at the local level. We discuss this issue in greater detail in Chapter III.

Table 1
State Policies as Barriers to School Enrollment for Homeless Children and Youth
(N=52)

Which state policies still pose barriers to school enrollment for homeless children and youth?

	Number of State Coordinators Reporting
Residency requirements	4
Requirements for school records	5
Immunization requirements	15
Legal guardianship requirements	15
Transportation	30

Table reads: When asked how their state changed its laws or regulations to eliminate residency requirements as barriers to school enrollment for homeless children and youth, four state coordinators reported that residency requirements still pose an enrollment barrier in their state.

Serving Homeless Children and Youth: Eliminating Barriers Posed by Residency and School Records Requirements

From its beginning, the McKinney Act specifically called on states to remove enrollment barriers for homeless children and youth created by state policies on school residency and school records transfers. Now, seven years later, few state coordinators report that these areas pose problems.

Residency Requirements

In general, state residency laws and regulations have required children to attend school in the district in which they reside. However, homeless children and youth often have no official residence and frequently move before they can establish residency in a given district. State and local definitions of residence and requirements for proof of residence have had the effect in the past of delaying or denying enrollment of homeless children and youth. In addition, moving to find shelter outside of a district has forced homeless students to leave schools where they are already enrolled, adding further dislocation to the trauma of being homeless.

The McKinney Act addressed both of these concerns by calling on states to review and revise their laws and policies to eliminate residency requirements as an obstacle and to enable students to remain in their school of origin when it was determined to be in their best interest. In response to McKinney, many states have undertaken legislative reform. For example, Mississippi adopted a "Verification of Residence" policy allowing homeless children and youth to enroll in school first and establish residency later. Nevada developed a regulation mandating that school districts enroll and provide educational programs to homeless children and youth. Vermont amended its residency laws to include the definition of homelessness provided in the McKinney Act and to remove residency issues as obstacles to the enrollment of homeless children and youth. All told, 27 states reported making changes to state residency laws or regulations so that homeless children and youth can enroll in school. In 16 of the 27, this resulted in a special allowance for homeless children and youth. Nine states made new efforts to enforce existing laws and another nine relaxed the enforcement of existing laws. Sixteen state coordinators reported that no changes were necessary in their laws or regulations, suggesting that residency requirements do not pose a barrier to school enrollment. In fact, only four state coordinators believe that their state residency requirements still impede the school enrollment of homeless children and youth.

The residency requirements actually experienced by homeless children and youth at the district level reflect a combination of state and local policies and practices. In some states, there is little room for district-level variation. Where local barriers exist, they are usually the result of ignorance or noncompliance. Two coordinators provided examples of policies that give districts little flexibility in determining residency requirements. In 1989, in response to the McKinney Act, Iowa passed a new law that for the first time clearly required all districts to enroll any homeless children or youth in their attendance areas, regardless of whether they were district residents. Similarly, also in 1989, Minnesota revised the residency requirements of the state school-attendance laws to prevent districts from barring enrollment to homeless students on the basis of residency.

Although many states have removed or revised legislation that impeded school access for homeless children and youth, translating state policy into local practice takes time and requires strong enforcement. In some states, for example, state policies have effectively given local districts enough autonomy to allow barriers to exist. One state, for example, allows districts flexibility on enrollment rules for homeless students. Although the office of the coordinator has developed a model policy and strongly advocates it to the districts, some districts have adopted policies that do not clearly guarantee school enrollment to homeless children and youth; residency requirements in such districts may still pose a barrier to school enrollment.

Finally, despite state changes to residency requirements, it is not clear how much choice homeless children and youth have in selecting a school to attend. Although the McKinney Act states that the best interest of the child must be considered in making school placement decisions, site-visit data suggests that determining what is in the best interest of the child rarely results in returning homeless children and youth to their school of origin, particularly when this requires transportation across district lines.

School Records Transfers

If schools require students' previous school records before enrollment, homeless children and youth may be delayed from enrolling in a new school each time they move. In a 1987 survey by the National Coalition for the Homeless, 25 percent of shelters reported having difficulty with and even denial of school placement because of lack of records from other districts (Cochran, 1991). Homeless families are likely to have difficulty keeping track of records, contacting schools, and working with school bureaucracies, all of which may lead to further delays. Because families move frequently, these delays can represent a significant interruption in the education of homeless children and youth.

Table 2
State School Records Requirements for School Enrollment
(N=52)

In your state, what best characterizes the current circumstances for most school districts regarding school records requirements for school enrollment?

	Number of State Coordinators Reporting
All students can enroll in school regardless of whether they have their school records	29
Special allowances have been made to enable homeless children and youth to enroll in school without their school records	11
Records are required, but their transfer is expedited through a well developed transfer system between schools and/or school districts	8
Records are required	1
Other	3

Table reads: Twenty-nine state homeless coordinators report that school districts in their state typically allow all students to enroll in school, regardless of whether they have their school records.

State coordinators are fairly satisfied that their current school records requirements do not impede the enrollment of homeless children and youth (Table 2). Most coordinators (29) reported that, in general, all children are able to enroll in school without school records. Only one state reported that records are still required for enrollment and described no effort to accommodate the needs of homeless children and youth. According to state progress reports, states have responded to McKinney by both legislating away the records requirements and setting up systems to assist schools and school districts in obtaining school records once homeless children and youth are enrolled in school. For example, in Nevada, an amendment to the Nevada Administrative Code frees homeless children and their families from the responsibility of presenting records for school enrollment. Instead, the code gives responsibility for obtaining school records to the receiving school. Also in response to McKinney, Idaho revised the Idaho Code Section 33.1404 to require schools to forward certified copies of a homeless student's records within 10 working days to the school where he or she has transferred.

In those states where school records continue to pose a significant barrier to school enrollment, state coordinators do not believe that state requirements are the culprit. Although coordinators in 15 states reported in a separate survey question that delays in obtaining school records were among the top three enrollment barriers for homeless children and youth, only one of these 15 cited state requirements as the source of that problem. Rather, they believe the problem lies at the local level. Evidence from our site visits, however, suggests that some state policies can help to eliminate local barriers. In Iowa, for example, state law was changed in response to McKinney so that a delay in the receipt of school records is no longer a legal reason for not admitting a child into school. The new law also prohibits schools from withholding students' records from their new school when students still owe school fees. Before McKinney, both of these local policies negatively affected the enrollment of homeless children and youth. According to the state coordinator, homeless students are now getting into school more quickly and receiving the services they need with fewer disruptions to their education.

Unresolved Legislative and Policy Issues: Immunization, Guardianship, and Transportation Requirements as Barriers to School Enrollment

Although state coordinators reported overall success in revising state policies to eliminate enrollment barriers created by state residency and school records requirements, many coordinators still reported difficulties resolving barriers posed by immunization requirements, guardianship, and transportation. Residency and school records are primarily school administrative concerns. On the other hand, immunization, transportation, and guardianship are related to more sensitive policy issues such as health, resources, and safety. As a result, these barriers have been more difficult for states to overcome.

Immunization Requirements

Typically, states require students to be immunized in order to enroll in school. In cases where homeless children and youth are not immunized or, as is likely, where they cannot document their immunizations, they may experience yet another barrier to enrolling in school. Unlike residency and records requirements, which most states have effectively waived by developing less stringent policies,

immunization requirements remain in effect as a way to fight disease. Only 10 states[10] allow students to enroll in school without immunizations (Table 3). Most states (42), instead, require all students to be immunized to enroll. In 27 of these states, however, the school systems endeavor to see that students are immunized and enrolled without delay.

Table 3
State Immunization Requirements for School Enrollment
(N=52)

In your state, what best characterizes the current circumstances for most school districts regarding immunization requirements for school enrollment?

	Number of State Coordinators Reporting
All students are provided with immunizations, if necessary, so that they may enroll in school without delay	14
Homeless children and youth are provided with the necessary immunizations (e.g., through a referral) so that they may enroll in school without delay	13
All students must be immunized before they can enroll in school and homeless children and youth may be delayed from enrolling as a result	9
All students can enroll in school regardless of their immunization status	6
Special allowances have been made to enable homeless children and youth to enroll in school regardless of their immunization status	4
Other	6

Table reads: Fourteen state homeless coordinators report that school districts in their state typically provide immunizations to all students, as necessary, so that they may enroll in school without delay.

[10] Six states allow all students to enroll in school regardless of their immunization status, and four states make special allowances to enable nonimmunized homeless children and youth to enroll in school.

Only two states changed their laws or regulations regarding immunization requirements for school enrollment. Instead, most states worked within their existing laws and regulations to address the enrollment barrier posed by immunization requirements. Nineteen states found that no changes were necessary in their existing policies. Seven states made new efforts to enforce existing laws, and four relaxed the enforcement of existing laws. Fifteen state coordinators reported making no changes to state laws and regulations in response to McKinney and reported that immunization requirements currently pose an enrollment barrier for homeless children and youth. In site visit interviews, state coordinators offered some explanations for the continuing barriers posed by school immunization requirements. A number of state coordinators, for example, asserted that schools cite federal immunization requirements enforced by the U.S. Department of Health and Human Services (HHS) as reason for refusing or delaying enrollment for unimmunized homeless children and youth. Although state coordinators were generally aware that this was not strictly true,[11] some were, nevertheless, forced to extremes in order to resolve the conflict. At least one state, Minnesota, received a ruling from the U.S. Attorney General stating that immunization requirements were not to prevent homeless children and youth from enrolling in school. In spite of this, some state and local policy makers still believe that federal health policy prevents them from enrolling students without immunizations. This has directly interfered with states' efforts to eliminate the enrollment barriers posed by immunization requirements.

Because the great majority of states require immunizations for school enrollment, eliminating this enrollment barrier depends on the effectiveness of state and local methods for providing immunizations or obtaining immunization records for homeless children and youth. Coordinators may, for example, require or recommend that schools provide immunizations on-site or verify immunizations records by telephone. School systems may, in turn, refer families to doctors, arrange an appointment with a doctor, or provide the immunizations directly.

Many states allow a grace period during which students may remain in school before they obtain immunizations or immunization records. Although this policy effectively prevents enrollment delays, the extent to which homeless students are allowed to remain in school depends, in part, on whether

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[11] In fact, HHS has no law or policy regarding immunization requirements for enrollment in school; such laws are made by individual states. The Center for Disease Control (CDC), however, does recommend a specific series of vaccinations that children should receive, but it is up to the states to determine which shots to require. The CDC does not recommend the exclusion from school of unimmunized children, except in the case of an outbreak of a contagious disease (e.g., measles). Then, the CDC would recommend, not require, that unimmunized students--in order to prevent them from contracting the disease--be discouraged from attending school until the disease has run its course.

they have subsequent access to immunizations. According to Texas policy, a district may grant a student a 30-day grace period to get immunized. Often, if a child does not have immunization records, the schools will have the child immunized themselves. However, the state coordinator reported some cases where districts decided not to grant a student the grace period as a way of keeping homeless students out of the school.

Guardianship Requirements

Public school systems and other service agencies place primary responsibility for children with their parents or legal guardians. States require that schools contact students' legal guardians before enrolling them or require that students have a guardian to establish residency. For homeless children living on their own or with relatives who are not their legal guardians, these policies often exclude them from services in the district in which they actually live.

For the safety and welfare of children, and to protect themselves from liability and over-enrollment[12], schools require a parent's permission for many enrollment and education decisions. As a result, few states set aside guardianship requirements entirely. Only 14 state coordinators reported that most districts allow all students to enroll in school without a legal guardian. Instead, 27 states reported that special allowances enable homeless children and youth to enroll without a legal guardian; another eight require a legal guardian for the enrollment of all students and reported that the enrollment of homeless children and youth is sometimes delayed as a result.

Like immunization requirements, the state policies on guardianship for school enrollment still present a problem for homeless children and youth. Fifteen state coordinators reported that state requirements for legal guardianship still pose a barrier to the enrollment of homeless children and youth. This can be the case even if state policies make special allowances to allow homeless children and youth to enroll without a legal guardian. For example, in 8 of the 27 states that make special allowances for homeless students on guardianship requirements, coordinators reported that such requirements still pose an enrollment barrier when children are not identified as homeless or when special allowances are not made at the district or school level. Not surprisingly, in those 14 states that allow all students to enroll in school without a legal guardian, none of the coordinators reported state guardianship requirements to be an enrollment barrier.

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[12] Schools that offer popular academic or extracurricular programs run the risk of attracting an over-abundance of non-resident students, thereby overloading the system and reducing the school's capacity to provide quality education services.

A wide range of concerns about guardianship policies emerged during our study. We heard of schools' and other agencies' concerns over their liability in the absence of a legal guardian. States were also concerned that liberal guardianship policies could be abused. In Texas, for example, a new law passed in response to McKinney enabled all children to enroll in school without a legal guardian. However, the law specified that enrollment cannot be for the purpose of participating in extracurricular activities, nor should it be used to evade court-ordered desegregation plans.

For unaccompanied youth to benefit from the special services and allowances available for homeless children and youth, they need to have their status specially recognized. That often can be a difficult process. In one state, for example, the state education department's definition of homelessness only includes those people receiving services from a local service district. As a result, runaway and homeless youth who are not being served by a service agency are not eligible to enroll in school under the accommodations for homeless children and youth. According to the state coordinator, this measure leads to some youth being denied access to school.

Transportation

Despite state coordinators' efforts, transportation is the major enrollment barrier currently facing homeless children and youth. When asked about changes in state laws, regulations, or practices related to transportation, 30 coordinators reported that transportation still poses a barrier to enrollment. This is twice the number that reported continuing barriers in any other state policy area. When asked to cite the top three barriers to school enrollment in their state, whether at the state or local level, 38 coordinators cited transportation to and from school.

Three factors combine to make school transportation a difficult problem for states to resolve through laws and regulations. First, school transportation is primarily a local issue. Second, unlike issues such as residency, school records, and even immunization and guardianship, the provision of transportation for homeless children and youth often requires the infusion of significant new resources. These resources are hard to locate in the current budgetary climate. Finally, even if policies and resources can be located to provide transportation, the other survival needs of homeless families often make the logistics of transportation difficult. That is, when a family moves to find food or shelter, the proximity of the shelter site to educational transportation services is usually not the family's primary concern.

Funding and arranging school transportation is primarily a local responsibility. In 43 states, coordinators reported that local districts are at least partly responsible for funding educational transportation for homeless students (Table 4). As a result, most states have not changed state laws and regulations on educational transportation for homeless students.

Table 4
State Funding for Transporting Homeless Children and Youth to School
(N=51)

In your state, who funds transportation to school for homeless children and youth?

	Number of State Coordinators Reporting
LEA	16
LEA and SEA	11
LEA and McKinney	11
LEA, SEA, and McKinney	5
SEA	4
McKinney	1
SEA and McKinney	1
Other	2

Table reads: Sixteen state coordinators reported that local education agencies in their state are the only sources of funding to transport homeless children and youth to school.

In our visits, we found only one example in which a state has legal authority to force districts to collaborate in the provision of transportation services for homeless students. Iowa law states that districts are required to provide transportation for all students living beyond a certain distance from the school. Under the recently passed Chapter 33 of the Iowa School Rules, if a homeless student moves to another district and wants to continue in the originating school, then both the sending and

receiving districts are responsible for transporting the student as far as their district boundaries. In state progress reports, only the Washington Department of Education reported initiating a policy change requiring all school districts to provide transportation for homeless children and youth to the school of their choice. The state pays the cost of transporting students beyond local district boundaries when public transportation is not readily available. According to their progress report, Washington planned to provide $667,000 in funding for the 1992-93 academic year to extend transportation services to homeless students.

One state coordinator offered a reason why states might not be more forceful in mandating educational transportation for homeless children and youth. The coordinator explained that the state cannot successfully issue a mandate to districts if it does not also provide the funding to implement that mandate. In fact, instead of using legislation to mandate transportation, most states use McKinney funds to subsidize transportation for homeless students. In 26 states, transportation was listed as one of the top five areas funded through McKinney grants to local districts. Although McKinney subgrants to local school districts were the main method for distributing funds for school transportation, only a handful of districts (an average of 10) in each state received these subgrants, and many homeless students remain unserved.

We found no examples of successful efforts to provide additional funding for educational transportation for homeless children and youth other than through McKinney dollars. The Maryland Department of Education has tried to get additional money for transportation for homeless students through the state legislature but has been unsuccessful. As a result, districts have absorbed these costs. In Massachusetts, although state law calls for the state to reimburse transportation for students living more than two miles from the school, districts are not being reimbursed due to budget cuts.

Nor have coordinators successfully negotiated collaborative pooling of resources with other service agencies to provide transportation for homeless students. Massachusetts attempted to fund educational transportation for homeless students using Emergency Assistance funds through a collaboration with the Department of Public Welfare. The attempt was squelched by that department's amendment of the Emergency Assistance regulations, prohibiting the use of those funds for transportation to school.

Remaining Legal Barriers: School Fees

Although the issues of residency, school records, immunization, transportation, and guardianship have received particular attention at the prompting of the McKinney Act, the problem of school fees

also emerged as an issue during our study. In general, state policies allow local districts to charge fees or fines for some school activities or materials. For homeless children and youth who have few if any resources, school fees interfere with participation in school.

Schools commonly charge fees or fines for uniforms, books or lost books, overdue or damaged library materials, and participation in extracurricular activities. For homeless students, these practices present enormous obstacles. In Iowa, for example, the coordinator reported that school districts charge fees for a variety of extracurricular activities, books, and materials without reducing these fees for homeless or low-income students, limiting their access to these activities. In Texas, textbooks are supplied through a centrally operated system and districts must pay to replace any lost textbooks. As a result, many schools are reluctant to give textbooks to homeless students because they believe the students are likely to lose them or move without returning them. In Dallas, both shelters we visited reported the need to obtain their own supply of textbooks so that homeless students can do their homework. In Austin, we heard the example of a girl who could not get any textbooks because she had lost her math book. After her mother complained through homeless advocates, the school issued all of her books except for the math text.

In some cases, local districts may withhold student records to recoup unpaid fees from students. In Iowa, before McKinney, schools often withheld school records from a student's new school if the student still owed for past fees. This practice is now illegal under the new state policies on school records. However, we heard examples of this practice still occurring in other states.

Issues Regarding Legislation: Special Accommodations, Mandates for Local Reform, and Benefits of Laws Unrelated to Homelessness

Special Accommodations for Homeless Children and Youth

States have most often overcome legislative barriers to school enrollment for homeless children and youth by introducing special policies or accommodations that exempt homeless children and youth from policies affecting nonhomeless children. Because students must be identified as homeless before they can benefit from a special accommodation, however, homeless children, youth, and families who are not aware of an option or who are unwilling to declare their condition may not be served. For example, one state's policy requiring that an individual receive services from a social service agency to be considered homeless excludes many unaccompanied youth. In another state, the local requirements that students provide proof of need to benefit from the waiver policy on school fees

present a clear barrier for homeless students who may lack appropriate records and identification or who may be unwilling to reveal their identity due to legal problems regarding their runaway/throwaway[13] status. In a third state, homeless children and youth must petition the local school board to be exempted from the residency and guardianship requirements.

Research on homeless families documents numerous reasons why families are reluctant to identify themselves as homeless. Many are ashamed of their condition, and many fear that they will lose their children or become ineligible for other services if they are identified as homeless. These fears are not unfounded: A state coordinator described a case in which a woman was advised to give up her children because they were living in a car. In addition, homeless families are often not fully aware of their rights. A lawyer for Legal Action of Wisconsin reported a perception that some districts throughout the state "strongarm parents into accepting less" special education than their children are entitled to. This problem is compounded by the fact that the legal assistance system relies on parents to make the first appeal for fulfillment of their children's rights, and homeless parents are unlikely to take this step if they are unaware of their rights.

In addition, local school districts are often inconsistent in their application of special policies, both from ignorance and resistance. In Texas, the state coordinator related stories of school secretaries who, ignorant of state policy, continue to deny homeless children and youth access to school because of inadequate records. In Alaska, where a student's physical presence is sufficient to establish residency, the state progress report indicated that some school districts' interpretations of residency requirements were misinformed, obstructing the enrollment of homeless children and youth.

Mandates for Local Reform

Because many enrollment obstacles are not directly under state control, efforts to review and revise state regulations and policies are not sufficient to remove local enrollment barriers. As a result, a number of states drafted laws requiring local districts to also review and revise their policies and practices to remove obstacles for the enrollment of homeless students. Texas, for example, passed House Bill 103 requiring local school districts to review and revise policies and procedures to ensure that homeless children and youth have prompt access to public school. The law specifically prohibits residency requirements, guardianship, or school records from being used to deny or delay the enrollment of homeless students. In 1990, the Minnesota Department of Education introduced a policy recommending that local education systems adopt policies that address the varied educational

[13] Youth who have been "thrown out" of their family homes.

needs of homeless children and youth, including transportation, early childhood screening, access to educational services, and independent-living skills for youth.

Almost every state coordinator reported efforts to educate local districts and encourage them to adopt policies that facilitate enrollment for homeless children and youth, and 31 states require assurances of compliance with state regulations. These efforts to require districts to review their policies can provide a comprehensive attempt to remove barriers and build collaborative local solutions. For example, in response to the state mandate in Minnesota, the coordinator reported that although recommendations costing money were generally delayed, other issues were addressed in some districts. Additionally, Minneapolis and St. Paul adopted policies of maintaining homeless children and youth in their schools of origin, if it was deemed to be in their best interest; homeless students, like nonhomeless students in Minneapolis and St. Paul, can choose the school they wish to attend.

Benefits of Laws Unrelated to Homelessness

In addition to homeless activists and state coordinators' work to create new state and local policies to benefit homeless children and youth, homeless youngsters often benefit also from laws or regulations that are not targeted at them. Laws, regulations, policies, and practices arising from other policy concerns have been used to overcome a variety of enrollment barriers.

In a number of cases, activists have worked to extend the boundaries of existing policies to apply them to homeless children and youth. A Hawaii statute that predates the McKinney Act allows "district exemptions" that enable students to remain enrolled in a school after they move out of its attendance area. The law indicates that the decision is to be made "with the welfare of the student as a major consideration." This law has been successfully extended to allow homeless children and youth to continue in their school of origin.

In some cases, the justice system can be used to extend existing legal rights to homeless children and youth. In Minnesota, the state homeless coordinator has actively used a 1968 ruling by the state attorney general that found that a residence is a place in which a child receives food, shelter, and emotional support. This ruling continues to be used to convince districts to enroll homeless children and youth within their borders. Legal advocates have argued that federal laws for education of students with disabilities could be selectively applied to homeless children. By applying these laws, the courts might place more responsibility on the schools to seek out homeless children and youth and provide them with special services.

Although existing policies may be extended to apply to homeless children and youth, these policies are not generally designed to cover the full range of their needs. A number of states, for example, have grace periods that allow children and youth to enroll before they obtain their immunizations. Virginia is one that offers a 90-day grace period for all students, not just those who are homeless. However, as discussed above, not all of these states guarantee that homeless children and youth receive their immunizations before the grace period expires, and, after that time, homeless students may still be excluded from school.

Minnesota's open-enrollment policy is an example of a policy that provides homeless students with a ready exception to residency barriers and easier access to transportation. According to the state's open-enrollment director, at least 200 of the 8,000 students using the open-enrollment option each year are homeless students bypassing local-residency requirements. In Minneapolis, because of open enrollment, 92 percent of students are bussed to school. District administrators reported that it is rare for a student who wants to attend a particular school not to be able to get transportation provided by the district, regardless of the attendance area. However, according to the state open-enrollment coordinator, some districts refuse to apply the policy to homeless students, citing other requirements. Because the regulations do not deal specifically with homeless children and youth, the state cannot easily discipline these districts.

III. STATE-LEVEL SERVICES AND ACTIVITIES TO MEET THE EDUCATIONAL NEEDS OF HOMELESS CHILDREN AND YOUTH

In this chapter we describe the role and responsibilities of the Office of the State Coordinator of Education for Homeless Children and Youth and highlight those activities to which the most time and energy are devoted. Specifically, we examine state coordinators' efforts to : (1) identify homeless children and youth; (2) raise awareness about their condition; (3) coordinate services; (4) improve their access to educational services; and (5) provide technical assistance and training to schools and other organizations that deliver needed services. A brief discussion of the ways in which other state agencies and organizations facilitate state coordinators' efforts is also presented.

State Office of the Coordinator of Education of Homeless Children and Youth

The position of state coordinator of education of homeless children and youth is typically a part-time responsibility, although most (40) are full-time employees who work 35 hours or more per week at their sponsoring agency. Only 16 state coordinators devote 35 or more hours per week to their responsibilities as coordinator of education for homeless children and youth, and 22 coordinators--nearly one half of the total--work 20 or fewer hours per week in the capacity of coordinator.

The offices of state coordinators are located in various departments and divisions within state education agencies. Data from our site visits indicate that they are most frequently found within departments, such as student support services, that address a broad range of educational and social welfare concerns, or in departments that focus on dropout prevention and at-risk populations.

The location of the state coordinator's office within the larger organization, however, does not appear to strongly influence the activities of the state coordinator. For the most part, the issues that are addressed and the strategies that are selected are shaped by the assessments of state and local needs, both formal (e.g., surveys, funded studies) and informal (e.g., conversations with shelter providers or school personnel) and by the preferences and choices of individual state coordinators. Most of the state coordinators with whom we spoke indicated that they enjoy a fair degree of autonomy and flexibility in setting an agenda for their office, organizing and targeting their efforts, and planning a program of activities.

In the following section, we examine in more detail the various ways in which state coordinators fulfill their roles and responsibilities and the effects that these efforts have had on homeless children and youth in their state.

Specific Roles and Responsibilities of the State Coordinator

Under the McKinney Act, state coordinators are required to: (1) gather data on the number and location of homeless children and youth in their state and report this information to ED once every two years[14]; (2) develop and carry out the state plan; (3) facilitate coordination between and among agencies that provide services to homeless families, and (4) develop relationships and coordinate with relevant education, child development or preschool programs, and other providers of services to improve the provision of comprehensive services to homeless families.

The strategies selected for completing these tasks and achieving the goals of the office vary across the states as individual coordinators establish different priorities and methods. For example, some state coordinators may choose to focus on state legislation and policy to accomplish a particular goal, while others may choose, or be called on, to provide more direct services to local officials.

The range of services and activities of state coordinators are described and analyzed within each of the categories described below.

Identification and Tracking of Homeless Children and Youth

Locating homeless children and youth is often difficult. The relative success of a state's or school district's identification process depends on the willingness and ability of a variety of noneducation institutions and agencies to provide accurate data. Many shelter providers do not keep data on

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[14] Under the new legislative requirements, state coordinators are no longer required to gather data on the number and location of homeless children and youth every two years. Rather, every three years, state coordinators are required to "gather, to the extent possible, reliable, valid, and comprehensive information on the nature and extent of the problems homeless children and youth have gaining access to public preschool programs and to public elementary and secondary schools, the difficulties in identifying the special needs of children and youth, any progress made by the SEA and LEA in the state in addressing such problems and difficulties, and the success of the program under this subtitle in allowing homeless children and youth to enroll in, attend, and succeed in school." [Section 722 (f)(2)].

the number of children served, their ages, their school status, or other pertinent information. In addition, shelter providers, already overwhelmed by the other demands that are placed on them, are sometimes frustrated at being asked to participate in an identification and tracking program. The successful identification of homeless students also depends on the willingness and ability of school personnel to determine the students' status, not only when they initially enroll, but throughout their school career because students may become homeless at any time.

> In **Maryland**, the identification and tracking of homeless children and youth represents a collaborative effort between the state Departments of Human Resources and Education. All shelter providers, including those who operate shelters for battered women and teenage runaways, are asked to complete the state's tracking forms during their regular intake procedures. The forms identify children and youth 18 years old and younger, with those between the ages of 5 and 16 considered to be of school age. The state also relies on school personnel to complete tracking forms for those students who do not reside in a shelter. Shelters are required to report their figures on the number of homeless children and youth on a monthly basis, and school districts report their figures quarterly.

The identification and tracking of homeless children and youth is further complicated by several other factors. Homeless families that live on the streets, in cars, or in abandoned buildings are frequently never detected. Homeless families that are able to move in or "double up" with relatives or friends are often hidden from the authorities because they are not eligible for available social services and programs. In fact, homeless people who are doubled up may not view themselves as truly "homeless" and so do not identify themselves as such to schools and other organizations. In addition, homeless families sometimes go to great lengths to disguise the fact that they are homeless. Some are embarrassed by their condition, while others may fear that revealing their status will result in local authorities intervening and separating family members (e.g., placing children in foster care). Homeless persons who have left abusive mates--or parents, in the case of some runaway youth--fear that revealing their status, or details such as their social security number, will enable those individuals to track them down. Thus, although undercounting the number of homeless children and youth is common in states that rely almost exclusively on shelter-based counts, those states and localities that base their estimates on school record data or on comprehensive reports from several social services agencies experience this problem too.

Nearly everyone with whom we spoke acknowledged that in addition to undercounting, there is also the problem of doublecounting. Doublecounting frequently occurs because different social service agencies and organizations serve, and therefore count, some of the same people. This situation is exacerbated because homeless families tend to be highly mobile, moving from one local area to another and requesting services accordingly. Only five states use statewide computerized systems to identify and track homeless children and youth. (Three states use computerized systems in

a single local area within the state only.) However, one state coordinator admitted that in the absence of a social security number or other numerical identification, she could not guarantee that her state's computerized tracking system did not include individuals who had been counted more than once by different organizations or agencies.

States have tried to comply with the McKinney Act by using various techniques for gathering information on the number of homeless children and youth within their borders (Table 5). For example, 21 state coordinators reported that they based their estimates on data gathered in comprehensive surveys of agencies and organizations that serve homeless people; 16 reported that they relied on data from school records; and 16 also indicated that their estimates were based on longer-term--more than a single-night count--comprehensive, direct counts by local agencies and organizations that serve homeless people. This particular method may include periodic one-day or one-week counts over an extended time. Less comprehensive methods such as "one-night shelter counts only" and "longer-term direct counts in shelters only" were performed by fewer states--four and seven respectively. Nevertheless, as many as 11 states based their estimates on such incomplete methods, which is cause for concern.

Awareness-Raising Activities

Significant differences exist among and within states in the level of community awareness of issues related to the definition, condition, needs, and rights of homeless children and youth. For example, although one state coordinator confidently stated that the level of awareness in all the school districts in her state is high, others bemoaned the ignorance of the needs and rights of homeless children and youth that they find in many school districts around their state. As a result of differences in the perceived need for this activity, the amount of time that state coordinators spend on awareness-raising activities varies. For example, one state coordinator told us he only spends about 10 percent of his time on this activity; most of his time is spent networking, locating resources, and advocating on behalf of individual students. Another state coordinator indicated that he still views awareness raising as a primary activity because of the insensitivity and resistance to change that still exist in many districts throughout his state[15].

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[15] The new legislation requires states to develop and implement professional development programs for school personnel to heighten their awareness of, and capacity to respond to, the specific problems of homeless children and youth [Section 722 (d)(5)].

Table 5
Measuring the Population of Homeless Children and Youth
(N = 52)

How has your office most recently gathered data on the number of homeless children and youth living in your state?

Data-Collection Methods	Number of State Coordinators Reporting
Estimate from comprehensive survey	21
Longer-term comprehensive direct count	16
School records	16
Estimate from a survey of only shelter providers	12
One-night comprehensive direct count	11
Estimate from a survey of only social service agencies	11
Longer-term direct count in shelters only	7
One-night direct count in shelters only	4
Other[16]	17

Total exceeds 52 because respondents chose multiple answers.

Table reads: Twenty-one state coordinators reported that the method their office most recently used to gather data on the number of homeless children and youth living in the state was an estimate from a comprehensive survey

Note: "Comprehensive" refers to all agencies and organizations that serve homeless people, including social service agencies, shelters, schools, etc. "Direct count" refers to actual counts rather than estimates of the number of homeless children and youth.

[16] "Other" responses included: (1) yearly counts, (2) a focus group of school and shelter officials, (3) one-day survey of schools, and (4) estimates from school districts and targeted homeless shelters.

Awareness-raising activities are not necessarily limited to school personnel and community members. The state coordinator in Iowa explained that he set out to increase awareness within the department of education and successfully included the category of homeless children and youth as a target population in several department programs (e.g., School-Based Youth Service Initiative). As a result of these efforts, the amount of state money directed at homeless children and youth through these other programs has been increased.

One of the most frequently reported methods for raising awareness among school personnel is staff development. In fact, 40 state coordinators indicated that this was one of their primary activities when serving homeless children and youth (Table 6). In one state, we were told that most awareness-raising activities sponsored by the state are usually in the form of inservice workshops for teachers and school personnel. Special inservice teams that travel around the state and include shelter providers and representatives from the state departments of education, public welfare, social services, and public health make presentations at schools. Information is provided on a range of topics such as the condition of homeless people, relevant laws and regulations, and instructional strategies. Services are often provided by the inservice teams, however, only at the request of individual schools and districts. Thus, there is no guarantee that those who most need education on issues related to homeless children and youth actually receive it. In addition, although workshops may be beneficial to those who choose to participate, relatively few are offered. One state coordinator reported that limited resources make it difficult for the state to conduct more than six sessions each year, even though 46 school districts in the state serve large pockets of homeless children and youth. In Washington, the state coordinator attaches her homeless awareness-raising workshops onto as many other workshops around the state as possible.

Materials development and distribution is a common awareness-raising strategy that state coordinators use. A resource book prepared by the Wisconsin Department of Public Instruction includes a question-and-answer paper on educating homeless children and youth, information on the McKinney Act and definitions of homelessness, a monitoring guide for subgrantees, and a compilation of materials and ideas available for educators wishing to address homelessness. Other state coordinators reported that districts or individual schools around their state had received state reports on homelessness; resource booklets for school personnel that provide questions and answers about homeless students, instructional tips and strategies, information on various local programs and efforts in other states to serve the educational needs of homeless students; and other relevant information.

Table 6
State Services Provided to Homeless Children and Youth Other Than Through McKinney Grants to LEAs
(N=52)

Consider the services that your office provided to homeless children and youth in your state, other than through McKinney grants to LEAs. Among the following, please indicate the five services that receive the most support (e.g., time, money, etc.).

State Services Provided to Homeless Children and Youth Other Than Through McKinney Grants to LEAs	Number of State Coordinators Reporting
Professional development for educators and other school personnel to increase their awareness of the needs and rights of homeless children and youth	40
Coordination between schools and agencies serving homeless children and youth	37
Education for homeless parents regarding the rights and resources available to their children	19
Evaluations of the needs of homeless children and youth	18
Evaluations of the eligibility of homeless children and youth for educational programs and services	15
Before-school, after-school, and summer education programs	14
Tutoring, remedial education, or other education services	14
Transportation not otherwise provided	13
Tracking, obtaining, and transferring records necessary for school enrollment	12
Referrals for medical, mental, and other health services	11
School supplies	9
Early childhood programs for homeless preschool-aged children	5
Other	11

Total exceeds 52 because respondents chose multiple answers.

Face-to-face meetings can be a means by which state coordinators increase awareness among personnel from schools, districts, and state and local organizations. For example, in the months that followed the passage of the McKinney Act, one former state coordinator who is acknowledged as being very successful relied heavily on personal contact to achieve her goals of increasing awareness and removing barriers to the education of homeless children and youth. Specifically, she: (1) met with every superintendent in the state during their monthly meetings and presented them with data on the number of homeless children and youth located in their district; (2) visited every school in the state that served children living in homeless shelters and provided inservice training to the staff; (3) held meetings with shelter directors to "get them on board" by familiarizing them with the state's tracking system and conveying the state's interest and commitment to meeting the educational needs of homeless children and youth.

Other state coordinators reported that they raise awareness by becoming involved in task forces, committees, and other organized groups that address issues relevant to the education of homeless children and youth. For example, in Virginia, the coordinator is a member of: (1) the state JTPA team; (2) Project YES, which addresses dropout prevention; (3) the National Employment Training Association, which addresses vocational education; (4) the Governor's Advisory Committee on Child Support Services; and (5) the President's Committee to End Homelessness.

Some state coordinators are regularly present at large state and national conferences and other public events sponsored by various education and social services-related organizations. These events provide publicity, help to build support for the cause of educating homeless children and youth, and may be used to promote specific goals. For example, one state coordinator, who seeks to reduce the reliance of districts on McKinney funds by making homelessness a "mainstream" issue that attracts support from many different sources, reported that she regularly meets and speaks with representatives from diverse agencies and organizations to increase awareness and sensitivity to the interconnected and cross-cutting needs and issues that face homeless children and youth.

Coordination and Collaboration

Under the McKinney Act, each state must ensure that coordination occurs among the office of the coordinator and those school districts, agencies, and organizations that serve homeless children and youth; therefore, our survey data indicate that 37 state coordinators ranked "coordination between schools and agencies serving homeless children and youth" among the services that receive the most support from the state (Table 6).

Everyone with whom we spoke recognized the importance of this task. Several noted that even without the requirement to do so, coordination and collaboration would have been identified as a key responsibility and activity for state coordinators, many of whom recognize how coordination and collaboration with others have helped them to fulfill their own responsibilities as well. Explained one coordinator: "[With] one person working quarter time, we could never have achieved what we've achieved so far without help from other organizations."

Coordination and collaboration focus on identifying available services and resources and communicating this information to those in need. By promoting coordination and collaboration locally, states have enabled school districts and service providers to stretch their available resources and thus be able to better serve homeless children and youth.

Several state coordinators and other state officials with whom we spoke emphasized the value of collaboration and coordination in enhancing program effectiveness and expanding the reach of efforts to meet the needs of homeless children and youth. For example, one state coordinator emphasized that the small amount of money available to the states and districts through McKinney should be spent in ways that will maximize its impact. She stated that "McKinney is seed money...it's not to buy staff, playground equipment, etc. The major emphasis is to provide seed money to provide educational services to homeless children and youth." A state official at another site commented: "I feel strongly that state coordinators should not spend their time just working on issues related to educating homeless children and youth. People who only address these issues aren't able to access other resources and programs." For this reason, she works closely with personnel in the Chapter 1, Migrant Education, and Special Education Offices and acts as "a nudge" who persistently brings the issues facing homeless children and youth to the attention of people throughout the state's department of education.

Several coordinators also suggested expanding coordination and collaboration efforts to include financial integration and stronger programmatic links. For example, one state coordinator noted that if he could coordinate finances (e.g., pooling some federal funds for substance-abuse programs with funds for homeless children and youth because many homeless parents and youth abuse drugs), he would be able to do even more for local districts in his state that are struggling to meet the needs of homeless children and youth.

Some state coordinators promote collaborative efforts by helping to create advisory councils or community focus groups with representatives from social service agencies, community action agencies, state and local government agencies, schools, and school districts. State coordinators who have established long-standing relationships with state personnel in related departments, social service

providers, and school district personnel are particularly effective in creating these working relationships. In addition, they are in a good position to build bridges between people and organizations and be more persuasive because of their background knowledge and experience[17].

Access to Educational Programs and Services

Although significant progress has been made in increasing the numbers of identified homeless children gaining access to school since the passage of the McKinney Act, a significant proportion of these youngsters experience difficulty in gaining access to needed educational services such as gifted and talented programs and Head Start (Table 7). What is particularly telling is the fact that many state coordinators do not even know whether problems of access to particular services exist. For example, 10 or more state coordinators checked the "Don't Know" category for four of the eight programs about which they were specifically questioned.

The survey revealed that the programs that the largest numbers of state coordinators rated as difficult for homeless children and youth in their state to access were[18]:

- Head Start or other publicly funded preschool program (29 state coordinators)[19];
- Special education (25 state coordinators);
- Gifted and talented (22 state coordinators);
- Chapter 1 (21 state coordinators); and
- Programs for limited English proficient students (21 state coordinators).

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[17] According to the new legislation, the state coordinator shall "facilitate coordination between the State educational agency, the State social services agency, and other agencies providing services to homeless children and youth, including children and youth who are preschool age, and families of such children and youth;" [Section 722 (f)(5)].

[18] These data combine "great difficulty" and "some difficulty" survey response categories.

[19] Given the recent amendments to the McKinney Act [Section 722 (f)(5)], access to Head Start and other preschool programs may improve. That is, the new legislation expressly requires district liaisons for homelessness issues to ensure that homeless children who are eligible are included in Head Start and Even Start programs, and preschool programs administered by the LEA [Section 722 (g)(7)(A)(ii)].

Table 7
Access of Homeless Children and Youth to Education Programs and Services (N = 52)

To what degree do homeless children and youth have difficulty accessing educational programs and services?

Education Services	Number of State Coordinators Reporting: Great Difficulty	Some Difficulty	No Difficulty	NA	Don't Know
Head Start or other publicly funded preschool programs	11	18	11	2	10
Gifted and talented programs	9	13	13	0	17
Special education	6	19	20	0	7
Chapter 1 basic program	3	18	26	0	5
Migrant education	3	10	27	0	12
Programs for students with limited English proficiency	2	19	18	1	12
Free or reduced price school lunch	0	12	38	0	2
State compensatory education	0	12	20	11	9
Other	1	1	48	1	1

Table reads: Twenty-six state coordinators reported that homeless children and youth in their states have no difficulty gaining access to Chapter 1 basic programs.

Although states may have policies and laws that declare that access should not be denied, this does not guarantee that homeless children and youth get into the educational programs for which they are eligible. There are many reasons for this. At one of the sites we visited, we were told that the inter-district transfer of documentation regarding a student's special education status can take as long as 45 days and even intra-district transfers may take a long time. During this period, a homeless student may not receive the services he or she needs, and may in fact leave the district before the paperwork arrives, only to repeat the process at the next school. In another state, the state coordinator told us that homeless children and youth are often the victim of school district policies that allow schools to refuse to release students' documents to other schools if fees are owed.

Homeless children and youth are also denied access to educational services when programs and services are limited or nonexistent. If the special education classes or Head Start programs are filled to capacity or--as is often the case with preschool programs--they just do not exist, homeless children and youth will not be served. Nevertheless, the demand for these programs is real. Preschool-aged homeless children, for example, represent one of the largest segments of the population of homeless children and youth: state coordinators reported in the survey that preschool-aged homeless children represent 25 percent of the total population of homeless children and youth.

In general, data from our site visits indicate that state coordinators address the issue of improving access to educational services with less intensity than some of their other activities. Ensuring access to educational services such as Chapter 1, Head Start, and special education did not appear to be a high-priority activity for many of the state coordinators we interviewed. For some state coordinators, it is a matter of limited resources. Most of their time and energy is already consumed with just getting homeless children and youth into school; the nature and quality of the services these students receive once they have arrived at school is viewed as a secondary issue--if it is even considered at all. Others could offer no suggestions for overcoming barriers (e.g., non-existent or overcrowded programs) that appear to be beyond their control. Those who do address the issue typically disseminate information about policies and regulations related to specific programs to key people around their state. For example, in Virginia, relevant school and social service personnel are informed that a 1992 law stipulates that all homeless children and youth automatically are eligible for Chapter 1 funds and services. The effects of this type of initiative are, as yet, unknown.

Identifying Local Needs

In the survey, state coordinators reported monitoring LEA activities through the LEAs' required assurances of compliance with federal and state regulations, and through phone and mail contacts.

State coordinators also reported making occasional visits to school districts, although most visits were to LEAs that had received McKinney Act subgrants. Data from our site visits revealed that districts that have not received McKinney subgrants receive much less individual attention and support from the state than those that have received funding. Limited time and resources make it impossible for state coordinators, particularly those in larger states, to monitor the activities of even a few school districts regularly. They seldom monitor the progress and needs of districts in remote areas with fewer homeless students.

Our perception that nongrantees receive little attention and few resources was reinforced at several sites. For example, one state coordinator informed us that all the school districts in the state that had McKinney subgrants had received some valuable evaluation-related materials to assist them in assessing their effectiveness in serving homeless students. At the time of our visit, these materials had been sent to less than 25 percent of the school districts in the state that had not received McKinney subgrants. When asked why these potentially valuable materials were not shared with all school districts that had homeless populations, the state coordinator explained that she had never thought that nongrantees would find the materials useful, but would rethink her dissemination plan. At another site, the state coordinator admitted that over the past year she had not been in contact with any nongrantee districts in the state but added that "if there had been a problem, I would have heard about it." Again, time pressures and other administrative responsibilities (for the many coordinators not working full-time on homelessness issues) force state coordinators to make choices about how they allocate their time, and they appear to be choosing to focus much more attention on subgrantees than on other districts in the state. As one state administrator lamented:

> I have to remind [the current state coordinator] that just because we have McKinney projects in some counties doesn't mean [homelessness] is contained in only those counties...it's all over the state.

In interviews, state coordinators explained that they only learn about local noncompliance with McKinney when there is a complaint--usually from a social service provider or homeless parent rather than through their own monitoring. And even then, as one state coordinator explained, "Districts are rarely cited for noncompliance with the requirements of the McKinney Act, despite egregious violations of the law." Nevertheless, in many of these districts, the state is viewed as the primary source of knowledge and authority on education issues related to homeless children and youth. Although all state coordinators reported that they respond to requests for information or assistance from school districts, the paucity of questions or requests for help cannot be interpreted as an indication that the educational needs of homeless children and youth are being adequately met.

Given that state coordinators have a great deal of responsibility, are limited by time, and must take on the additional task of administering a grant award process, it comes as no surprise that many have chosen to prioritize their local activities around those LEAs that have received subgrants. Nevertheless, we know from the state coordinators themselves that many other LEAs are serving homeless populations--some of them equal or greater in number to those in the LEAs that received grants. How, then, do states ensure that the homeless children and youth in the LEAs that did not receive McKinney grants have access to the services and activities they need? Other than through informal contacts with social service providers, few state coordinators in our site visit appeared to have a system for monitoring local compliance and identifying local needs.

Iowa's Educational Equity Review process (Figure 2) and Texas' Results-Based Monitoring program present models for helping state coordinators know where needs lie and which LEAs are out of compliance with the requirements of the McKinney Act. In 1992-93, the systems were able to identify districts that were not: (1) identifying homeless children and youth, (2) removing barriers to school enrollment, and (3) providing services that nonhomeless students received. By attaching McKinney compliance questions to other state-funded monitoring systems, state coordinators can more efficiently gauge--without adding to their current set of responsibilities--the extent to which LEAs are serving the needs of homeless children and youth. In addition, by having data on local needs and services, state coordinators can better assess how to allocate their time for supporting local-level efforts to meet the needs of homeless children and youth.

Figure 2
Iowa's Educational Equity Review

Each year, a team of two or three Iowa Department of Education (IDE) staff visits approximately 25 school districts (out of about 400) as part of IDE's Educational Equity Review process in compliance with Title IV laws. When the McKinney Act was passed, the state coordinator of homeless education suggested including homeless and at-risk students in the IDE's equity review process. Accordingly, the state coordinator provided training to 45 members of the review team on issues involving homeless students.

Regarding the education of homeless children and youth, the IDE reviews district policies to determine whether the district has a policy, process, or procedure for:

- Identifying homeless children and youth, enrolled in school or not
- Providing access to school for homeless children and youth, regardless of residence, immunization status, or transportation needs
- Encouraging educational continuity by allowing students to stay in the same school regardless of family mobility within the school district
- Ensuring that homeless students receive the same services provided to nonhomeless students in school
- Examining and revising school policies that act as barriers to enrollment
- Posting information in shelters and other locations encouraging the enrollment of homeless students in public schools

The state administrator in charge of the review process described the monitoring visits as "a good teaching time; an opportunity to provide technical assistance." If district officials have a policy regarding homeless children, the equity team will review their policy and any documentation generated from that policy. After being reviewed, the district is required to send IDE an action plan to address those areas cited as out of compliance. A year later, the review team leader returns to the district to look for evidence that district officials have implemented the plan.

Activities of Other State-Level Agencies and Organizations

The Office of the Coordinator for Homeless Children and Youth receives a great deal of assistance from various state government departments and from government and nongovernmental groups and organizations that operate at the state level. As the following discussion reveals, these various bodies provide the coordinator with information on needs and conditions of homeless children and youth in the state, help to establish the state coordinator's agenda and activities, and facilitate the state coordinator's efforts in other ways.

Advisory Councils and Task Forces

One of the primary ways in which organizations begin to build working relationships is through joint membership on state and local advisory councils and task forces. Advisory councils and task forces "bring people together who are in totally separate systems," according to one state coordinator we interviewed. They provide a forum for people who share similar goals and concerns--but who work in different organizations and locations--to come together, identify themselves, and share information and resources. Exclaimed one member: "We wouldn't know [certain] organizations and agencies existed if not for the council!"

Task force and advisory council membership often includes representatives from state, city, and county government, public and private service providers, legal services representatives, homeless advocates, and members of religious organizations. Activities may include the publication and dissemination of materials, workshop presentations, and rallies and marches to raise awareness of homeless issues. For example, the Advisory Committee to the Office of the Coordinator in Iowa has 19 members from all regions of the state. Working with the state coordinator, the committee developed a 130-page curriculum guide on homelessness that includes a whole-language unit and a resource section on organizations, materials, and speakers that address homelessness. The advisory committee also helped to produce a video that dramatizes the barriers homeless children face when enrolling in or attending school. In addition to producing educative materials, the committee has also tried to influence state policy on school fees for homeless children and youth.

One state coordinator summarized the importance of these advisory groups in this way:

> We serve on each other's boards. That's how I learn about the latest legislative problems; district problems; where kids are getting placed in homes, shelters, and schools. The council helps me identify problems and gaps in services...When you [can match] faces with names, you get the information and action you need to get things done.

Evidence of a state advisory council's ability to facilitate communication and enhance services to homeless children and youth was provided in a council meeting we attended during one of our site visits. During the meeting, a representative from the state's Department of Public Welfare learned, apparently for the first time, how the placement of homeless families in certain motels and hotels was having an adverse affect on these students' ability to get to school. He promised that, in the future, his staff would consider the issues of transportation and access to schools an important factor when making decisions about shelter and motel placement for homeless children and youth.

Table 8
Agencies and Organizations With Which State Coordinators Collaborate on Issues Related to Serving the Educational Needs of Homeless Children and Youth
(N = 52)

Consider the agencies and organizations with which your office has spent the most time collaborating and coordinating on issues related to serving the educational needs of homeless children and youth. Among the following, please circle the four organizations or agencies with which your office spent the most time collaborating and coordinating.

Networking Organizations/Agencies	Number of State Coordinators Reporting
Local education agencies	42
Other state government agencies	34
Other offices within your state agency	29
Homeless shelters	23
Social service organizations	22
State Coalition for the Homeless	15
Other homeless advocacy organizations	12
Schools	9
Other local government agencies	7
Institutions of higher education	3
Local businesses	0
Other	3

Total exceeds 52 because respondents chose multiple answers.

Table reads: Forty-two state coordinators report spending time collaborating and coordinating with LEAs on issues related to serving the educational needs of homeless children and youth.

Other State Departments

The needs of homeless children and youth, and the issues that they confront, cut across many agencies and departments. As a result of the overlapping goals and objectives among government agencies--particularly those that serve the same clientele--states have begun to recognize the value of interdepartmental communication and joint activities.

This type of effort was illustrated in 1990 when the state of Virginia formed an interagency committee to address the enrollment needs of homeless children and youth in the state's public schools. The committee included representatives from the state departments of health, education, medical assistance, mental health and substance abuse, and social services. The state coordinator reported that the interagency group has been helpful not only in gaining additional resources and services for homeless children and youth, but in increasing awareness of homelessness issues among a much wider audience than before.

Although it is likely that the quality of interdepartmental coordination and collaboration efforts varies among the states, 34 state coordinators reported that they spend much of their time engaged in this potentially beneficial activity (Table 8). This suggests that the majority of state coordinators may in fact agree with one state official who concluded that "McKinney can serve as the wedge or the driving force" that gets various agencies and organizations working together to address the interrelated needs that homeless families face.

IV. McKINNEY ACT SUBGRANT PROJECTS

The 1990 Amendments to the McKinney Act authorized state education agencies to award McKinney Act grants (often referred to as "subgrants") to local education agencies (LEAs)[20]. The grants are intended to support LEAs' efforts to sustain the laws enacted to support the educational needs of homeless children and youth. Because this activity is new under the 1990 amendments to the Act, it warrants a discussion separate from state-level activities under the office of the coordinator. The information presented in this chapter, however, only refers to those LEAs that have received McKinney Act subgrants, not districts nationwide. Its purpose is to illustrate how districts use their McKinney grants to meet the educational needs of homeless children and youth.

Drawing on data from the survey of 52 state coordinators and site visits to eight LEAs that have received grants, we describe and analyze the McKinney Act subgrant award process and discuss how subgrantees organize project administration, services, and monitoring in their efforts to serve homeless children and youth. In addition, we discuss how state coordinators of education of homeless children and youth support their McKinney subgrantees.

Awarding McKinney Subgrants to LEAs

Only a small number of LEAs applied for state McKinney Act grants in 1993-94; according to the survey of state coordinators, states averaged only eight new grant applicants in one year. Taken together, two percent of LEAs nationwide applied for McKinney Act grants in 1993-94. Among the state coordinators (36) who reported conducting a competitive grant award process[21], not much disparity exists between the number of new grant applicants and the total number of new grants awarded in 1993-94: 75 percent of applicants received grant awards.

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[20] Alaska, Delaware, New Hampshire, Vermont and Wyoming are still minimum-funded states (or close to it) and do not have the funds available to award subgrants to LEAs; data from these states are not included in the discussions that follow. Under the new reauthorization legislation, the minimum state funding level (excluding the BIA), will increase from $50,000 to $100,000.

[21] The majority of states (67 percent) report that the average grant award period is one year. Those states that did not conduct a competitive grant application process in 1993-94 awarded grants on a two-year cycle, and were between grant award periods. The new legislation, however, permits three-year grant awards [Section 723 (c)(3)].

All state coordinators reported efforts to raise awareness about the availability of subgrants, including disseminating requests for proposals to all LEAs and making some personal appeals to schools and school districts. In many cases, however, the low number of grant applicants may reflect recognition among LEAs with moderate numbers of homeless children and youth that they cannot compete for the grants on the basis of need. In interviews, however, state coordinators also attributed some school districts' failure to apply for McKinney grants to those districts' lack of awareness that homeless families live within their communities. They said district staff often fail to realize that many families are doubled up or living in public or private places not designated for sleeping accommodations, such as motor vehicles or abandoned buildings. State coordinators also said that there are administrators and teachers in school districts, particularly rural ones, who do not believe their communities have any homeless children or youth:

> They think that only people who live on the streets are homeless, and because they don't see any people on the streets, there are no homeless. People still envision the homeless person as an alcoholic male, or a tiny little child hanging out in a car with mom. Often we forget about youth, who are runaway or throwaway kids. School districts just don't get it. Some school districts still require students to live with a parent or guardian. They don't understand youth on the street; they don't understand doubling up.

The voluntary nature of the subgrant application process may preclude state coordinators from reaching a broad cross-section of the homeless population in their respective states; few state coordinators could say definitively whether grants generally go to LEAs with the largest numbers of homeless families[22]. The average grant allocation to states was $476,310; the range in grant size was wide, with a high of approximately $2.8 million (California), and a low of $63,000 (North Dakota). In FY 1994, states awarded an average of 71 percent[23] of their McKinney Act grant allocations to LEAs[24]. Some states used other state dollars to fund the position of state coordinator in order to ensure that the maximum amount of McKinney dollars was transferred to LEAs, and thereby, to more direct services for homeless children and youth. In any case, three percent of local school districts nationwide held McKinney Act grants in 1993-94 (Figure 3), and the average subgrant award was $57,380, suggesting that the absolute number of homeless children and youth who are benefiting from McKinney-funded special programs and services is not very great.

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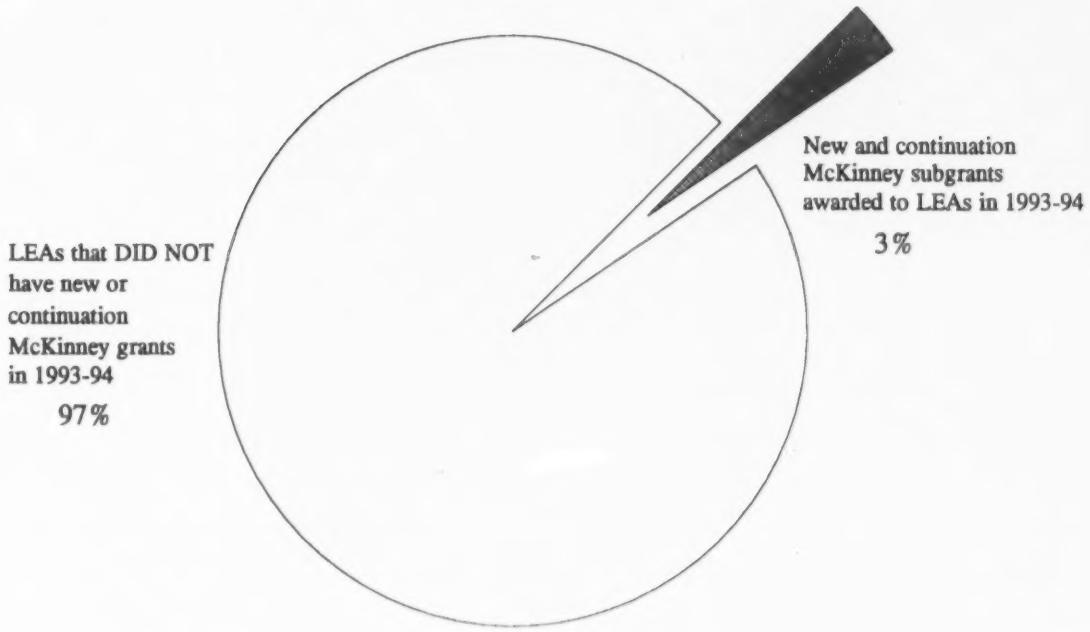
[22] This confusion may partly be due to difficulties in determining the size of the homeless population.

[23] The other 29 percent of McKinney Act funds is usually used to fund the position of state coordinator as well as administrative services.

[24] This figure is based on data provided by 47 of the 52 survey respondents.

Figure 3

Number of New and Continuation McKinney Subgrants Awarded to LEAs in 1993-94, by Total Number of LEAs N=52


New and continuation McKinney subgrants awarded to LEAs in 1993-94
3%
LEAs that DID NOT have new or continuation McKinney grants in 1993-94
97%

Total number of new and continuation grants awarded to LEAs in 1993-94: 529
Total number of LEAs: 16,379

Sources: U.S. Department of Education, National Center for Education Statistics, Common Core of Data Survey, 1991-92. (The total number of LEAs reflects the total number of regular school districts, including supervisory union components, and the total number of education service agencies and supervisory union administrative centers. In fact, several McKinney Act subgrants were awarded to types of LEAs other than the traditional regular school district).

Survey of State Coordinators of Education for Homeless Children and Youth, 1994, Policy Studies Associates.

Figure reads: In 1993-94, three percent of the total number of LEAs received McKinney grants from their state education agencies.

We were told repeatedly by state coordinators that districts that had not received McKinney monies were able to offer few, if any, special services to homeless children and youth.

Successful McKinney Grant Applicants

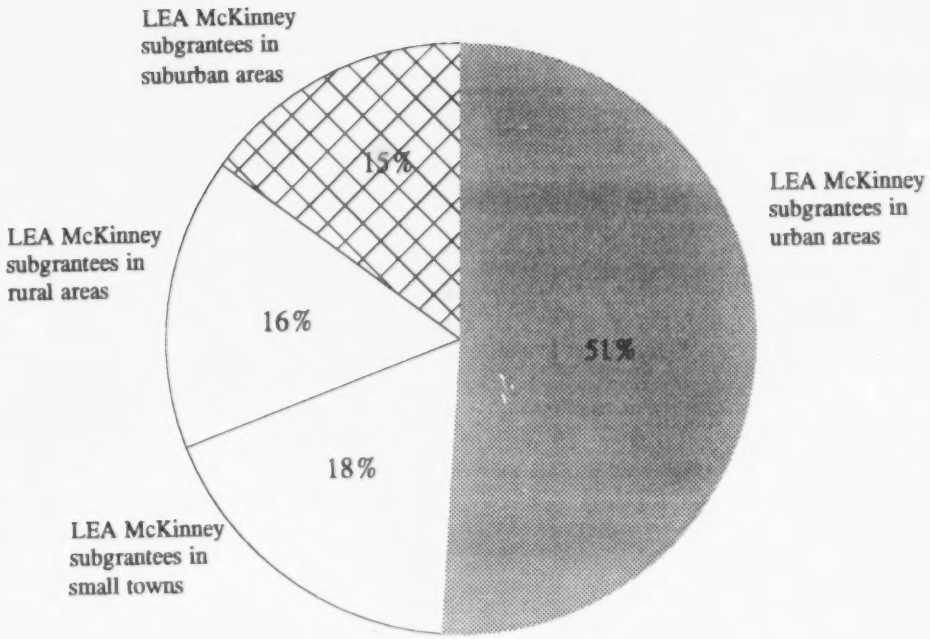
In interviews, many state coordinators said that the size of LEAs' homeless populations took precedence over most other factors in selecting McKinney Act subgrantees. This seemed particularly true in cases where the size of the homeless population was disproportionate to that of other LEAs applying for grant dollars. One state coordinator, for example, continued to award a subgrant to a large urban school district despite knowing that the district liaison for homelessness issues was not using the subgrant effectively. The state coordinator does, however, work with the district to try to improve the quality of services provided. In addition, by directing McKinney dollars into the district, the coordinator can exercise some leverage in getting the district to begin identifying and addressing the barriers affecting school access for homeless children and youth.

New and continuing McKinney Act subgrant projects operating in 1993-94 were evenly distributed among LEAs in rural, suburban, and small town communities; however, as Figure 4 shows, at 51 percent, LEAs in urban areas received the majority of the McKinney Act grant awards. The distribution of grant awards is consistent with the community types in which homeless children and youth reside: close to half of the state coordinators surveyed (24) estimate that between 50 and 100 percent of the homeless children and youth in their respective states reside in urban areas.

Subgrant Project Staffing

Subgrant project staffing varies among the eight local sites we visited. In some sites--usually those serving a small number of homeless children and youth--one staff person performs the administrative and operational tasks required under the McKinney grant; in others, project administration is apportioned among as many as 13 full- and part-time staff persons. In every subgrant project in our site-visit sample, regardless of staff size or configuration, the liaison for homelessness issues is the staff person who is responsible for the majority of project operations and administration. (The McKinney Act only requires those districts with subgrants to have liaisons.)

Figure 4
New and Continuing McKinney Subgrantees in 1993-94, by Community Type
N=49



Total number of new and continuing LEA McKinney grantees in 1993-94, by community type: 410

Source: Survey of State Coordinators of Education for Homeless Children and Youth, 1994, Policy Studies Associates.

Figure reads: In 1993-94, 51 percent of all LEA McKinney grantees were located in urban areas.

The Role of the District Liaison for Homelessness Issues

In most sites in our district sample, the district liaison for homelessness issues has primary responsibility for negotiating the network of district-level agencies and social service providers that makes up the "system"[25] of services for homeless children and youth. As one state coordinator described it, the role of the liaison is to "connect people to available services and to provide services where there aren't any; the liaison needs to identify needs and hook homeless families up with available social services within the community." Another state coordinator explained that knowing and negotiating the system are essential to the position of liaison:

> Getting the players talking and involved with one another's activities concerning homeless children and youth provides an awareness of options, collaborations, and services which is not automatic. You must know what's available.

Coordinating services and service providers is an important part of the liaison's responsibilities if only to ensure that services are not duplicated, thereby creating unnecessary competition within the network of service providers. The following examples illustrate the importance of coordination and collaboration in preventing service duplication:

> **Madison Metropolitan School District, (WI).** The evolution of the Transitional Education Program (TEP) from an intake program to an academic one was an attempt to meet students' needs and has required a fair amount of collaboration. For example, after-school programs that were previously offered at the Salvation Army shelter were integrated into the school program; staff at the shelter, the school, and the school district recreation department collaborate to operate the new after-school program.
>
> **Dallas Independent School District, (TX).** The Vogel Alcove and its funder, the Dallas Jewish Coalition for the Homeless, work with the district's liaison for homelessness issues and know to call her if they have a problem with school-related issues. The liaison and members of the service provider community noted that they let one another do their jobs: social service providers referred problems they were having with the schools to either the liaison or the district coordinator; and the school district referred noneducation problems of homeless students to the appropriate service provider. The district coordinator noted that such coordination reduced the likelihood of "turf wars" between the schools and the service providers. Said the liaison for homelessness issues, "They let us do the education, we let them do the social services."

With a multitude of agencies serving homeless people, it takes time to identify all the players. A district liaison who knows and can coordinate with the service-provider community can save some

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[25] In fact, there rarely exists a coordinated, cohesive set of services and activities available to meet the education and social needs of homeless children and youth.

time in launching school district efforts to meet the needs of homeless children and youth. As one liaison explained, although his district's program operates smoothly now, this did not happen overnight:

> It took time to get the shelter on every bus route in the city. It took time to get credibility and develop relationships [with service providers]. I sent memos to every principal and school social worker in the district to describe the district's services for homeless students.

Now that he knows who the players are, the district liaison says he can get school placement decisions expedited and override school waiting lists. Nevertheless, school placement and identification time were wasted in the period when relationships were developing. In addition, a rivalry developed between this liaison and the director of an alternative school because of their lack of familiarity with one another and their respective objectives for the service of homeless children and youth. This rivalry still impedes the provision of services that best meet the needs of homeless children and youth. Finally, collaboration is also important for identifying and tracking homeless children and youth. In the absence of computerized tracking systems, district liaisons for homelessness issues must often rely on their connections to the community to identify where homeless children and youth are currently living or migrating.

According to a variety of sources whom we interviewed during our site visits, district liaisons have improved the provision of services to homeless children and youth. In one state, for example, a university researcher who specializes in homelessness told us that before McKinney funded the homeless liaison position, educational efforts were more "haphazard"; parents preferred to keep their children in the shelter's tutoring program because it was close, even though it only met for 2.5 hours a day. Other children did not attend school at all:

> Having the homeless liaison and his social worker assistant located at the shelter is very important because it smoothes the process of enrollment and avoids any barriers that might arise between the shelter and the school system.

A coordinator in another state referred to liaisons as "people who are in positions where they can make local decisions without having to get additional approval or jump through hoops [to get things done]." Service providers in another district praised the consensus-building skills of the homeless liaison. In particular, they praised the liaison's commitment to serving the needs of homeless children and his ability to locate homeless families that "disappear" from other programs.

According to the survey of state coordinators, 37 percent of all LEAs in the country--both with and without subgrants--have designated a liaison for homelessness issues. It is encouraging to note

that this represents about 12 times the number of LEAs with McKinney Act subgrants, suggesting that LEAs are investing some of their own resources in addressing the needs of homeless children and youth.

Subgrant Project Services and Activities

In the national survey, state coordinators reported that the services and activities to which LEAs apportioned the most McKinney dollars were: (1) before- and after-school tutoring, (2) awareness raising, (3) coordinating and collaborating with other organizations and agencies serving homeless populations, (4) transporting children and youth to school, and (5) school supplies (Table 9). In addition, although not categories in the survey, identification and school placement of homeless children and youth and parent involvement were activities to which many LEA subgrantees in our site visit sample devoted time or apportioned McKinney funds. Each of these activities are among the principal activities promoted by the McKinney Act.

Before- and After-School Activities

Most of the subgrant projects we visited offer homeless children a supplemental instructional program that consists of before- or after-school tutoring sessions. Typically offered in the schools, these sessions provide homeless children one-to-one homework or other instructional assistance from a school teacher or volunteer tutor from the community. The following are some examples of the types of instructional services provided:

> **Baltimore Public Schools' (MD)** "Helping Hands" project is an after-school tutorial and homework-assistance project operated in the shelters. The goals of the project are to reinforce students' classroom work, build their self-esteem, and teach good study habits. The project: (1) provides reference materials (encyclopedias, dictionaries, atlases, etc.) and workbooks at each shelter; (2) provides language and mathematics games and manipulatives and reading materials; (3) establishes "reading corners" at each shelter; and (4) provides a limited number of cultural activities (about four each year) to enhance the tutoring sessions. The Helping Hands project operates in nine shelters in Baltimore. Each is staffed with one paid teacher-tutor and several volunteers from area high schools and the community. Four times a year, project staff receive professional training from hired consultants in innovative educational, psychological, and sociological strategies for working with children who live in homeless shelters.

Table 9
Services Provided to Homeless Children and Youth Through McKinney Act Grants to LEAs
(N=52)

What services for homeless children and youth receive the most funding through McKinney Act grants to LEAs?

	Number of State Coordinators Reporting
Tutoring, remedial education, or other education services	50
Before-school, after-school, and summer education programs	38
Coordination between schools and agencies serving homeless children and youth	34
Awareness-raising activities for educators and other school personnel on the rights and needs of homeless students	28
Transportation not otherwise provided	26
School supplies	25
Referrals for medical, mental, and other health services	13
Education for homeless parents regarding the rights and resources available to their children	10
Tracking, obtaining, and transferring records necessary for school enrollment	8
Early childhood programs for homeless preschool-aged children	8
Evaluations of the eligibility of homeless children and youth for educational programs and services	2
Other	6

Total exceeds 52 because respondents chose multiple answers.

Table reads: Fifty state coordinators report that tutoring, remedial education, or other education services receive the most funding through McKinney grants to LEAs.

Dallas Independent School District (TX) provides after-school activities for homeless students in the five elementary schools serving the largest number of homeless children and youth in the city. Four days a week, homeless students participate in 2 1/2 hour sessions that focus on: (1) educational activities, including homework assistance, reading, and computer work; and (2) recreational activities, including YMCA-operated play groups. On the fifth day of the week, staff from Rainbow Days, a nonprofit corporation whose mission is the prevention of substance abuse and self-defeating behaviors in children and youth, meet with children and parents in a safe, structured, and confidential setting to discuss a particular issue, such as self-esteem building, recognition and self-expression, family and friends, change, or chemical dependency.

Few subgrantees collect formal evaluation data to determine whether supplemental instructional programs have been successful in helping to improve the school achievement of homeless children and youth. Many argue that such data would reveal little about the specific effects of the tutoring intervention, given the particularly short period of time homeless children and youth are enrolled in a particular school or live in one shelter. Those subgrantees that collect outcome data do so largely through informal interviews with teachers of homeless students; consequently, they have mostly anecdotes to offer as evidence of tutoring success:

> We know the [tutoring] program works because students' attitudes improve, their attendance improves, and their self-esteem improves. We have been successful in the sense that the kids come to school, their grades are good.

> The kids that participate show improvement in academic achievement, self-esteem, attendance, and behavior.

> There is so little continuity in these children's lives, it makes a difference that there's a live person looking out for them at the school. Children who get 45 minutes of attention act like you're their long-lost family member when you see them at school two months later.

Finally, few LEAs in our site visit sample target McKinney-funded services for homeless youth. Indeed, although these LEAs provide instructional support services to homeless children, it is not clear that they are using their resources to meet the greatest needs among the homeless student population. As was mentioned in Chapter III, homeless youth, in fact, may be among the most disenfranchised segments of the homeless population. They rarely attend school because of guardianship and housing issues and have few educational or social services available to them (MacKay & Hughes, 1994; Minnesota State Department of Education, 1994). Yet most state coordinators and LEAs choose to fund services targeted at homeless children, who, more than homeless youth, have better (albeit not guaranteed) access to such supplemental instructional programs as Chapter 1 than do homeless youth. Whether state coordinators or LEA administrators have fully assessed the homeless population in determining how best to meet their needs is unclear.

Awareness Raising and Sensitivity Training

Among the eight McKinney subgrant projects we visited, most provided some information and staff development to teachers and administrators about how to recognize and meet the needs of homeless children and youth. In addition, most projects distributed a pamphlet to homeless parents describing the rights of their children to a free, appropriate education and the resources available to them. Some subgrantees, however, went beyond these approaches to raise awareness in their communities. The following are a few examples of some of the resourceful awareness-raising and sensitivity-training activities districts with McKinney subgrants sponsor:

Madison Metropolitan School District's (WI) The Transitional Education Program (TEP) prepared a kit for teachers that contains laminated curriculum information on homelessness, poverty, and mobility. The kit includes pictures taken at shelters, posters and lesson plans developed by other states, suggested classroom activities, trade books, bibliographies, news articles from adult and children's publications, and Dane County statistics on shelter use. The kits are kept in a centralized library. TEP also developed a slide show that staff present to community groups and classrooms, and several videos on homelessness are in the works.

New York City Board of Education's (NY) McKinney subgrantees procure the services of the Interfaith Assembly on Homelessness and Housing to provide sensitivity training and awareness-raising workshops for school personnel, shelter staff, and parents living in temporary housing. District administrators deem sensitivity training important for school personnel and shelter staff because some school personnel treat homeless students differently from nonhomeless students. The coordinator of one community school district reported that teachers at one particular school were stigmatizing children from the temporary housing facilities a few years ago. "At one time, the principal had the facilitator who worked with those children using the boys' bathroom as an office."

Evidence suggests that local awareness raising has yet to fully eliminate insensitivity toward homeless children and youth in the schools. Liaisons for homelessness issues reported incidents of insensitivity and unnecessary enrollment delays at the school level, despite their efforts to sensitize school staff to the needs of homeless students. Having records transferred for homeless students, explained one liaison, "is like pulling teeth. It's harder to get records transferred within the district than it is to get records from schools outside the district." All liaisons mentioned isolated cases of teachers who have insensitively referred to homeless children as "shelter children" or sent them home because "they needed to dress better."

Evidence from the site visit data also suggests that focusing awareness raising on just school administrators, teachers, and homeless parents may not be enough. Community members and parents of nonhomeless students must also be educated about the needs of homeless children and youth

residing in the community, particularly when those children and youth are concentrated in a few schools. As a number of service providers told us, states and school districts are just dealing with the tip of the iceberg by raising the awareness of teachers and school officials: "The general public is less aware." One school district, for example, experienced a community backlash over the use of a single school for the placement of homeless children and youth. Parents of nonhomeless children complained that the high mobility of homeless children disrupted the school experience for nonhomeless students and teachers. Teachers, they said, spent a lot of time orienting new students, and the classes lacked cohesiveness. In addition, parents complained that the focus on problem behavior, presumably that of the homeless students, took away from activities that reward the "good" kids. Although the district eventually mollified the parents through some last-minute awareness raising about the needs and conditions of the homeless population, the community backlash made the district more aware of the need to educate communities and perhaps move away from the single-school approach to homeless education.

Coordination and Collaboration Among Local Service Providers

In our interviews with state coordinators, most said school districts have done a good job of setting up lines of communication among school officials and shelter providers for the identification and school placement of homeless children. Some districts, however, have gone beyond this basic approach to the tasks of coordinating services and collaborating with agencies serving homeless children and youth. The following are some examples of LEAs that have coordinated with other service providers and agencies to access additional resources and broaden the cluster of services available to homeless children and youth:

In **Salisbury Public Schools (MA),** homeless children and their parents are receiving services funded by Chapter 1 and Chapter 2 dollars, and by district-level early childhood education money. State Chapter 1 and early childhood education dollars help support the reading library where parents can come for workshops on literacy and parenting skills. The liaison for homelessness issues also coordinated the services of a local community-based organization to provide GED training for parents of homeless and at-risk children. School district and Chapter 2 dollars support individual and family counseling services.

Dallas Independent School District's (TX) subgrant program successfully tapped an existing network of service providers. Available services include a licensed childcare center, psychological assessments to prevent developmental delays, and immunization and other health care services, to name a few. The liaison for homelessness issues and the district coordinator also try to work with existing programs in the city rather than establish new ones. For example, they used McKinney funds to enroll homeless students in an existing YMCA after-school program rather than create a separate recreational program for homeless students at school.

As was discussed earlier, much of the ability to coordinate and collaborate comes from the experience of the district liaison for homelessness issues. Those who have more experience working on issues of homelessness and who have strong connections to the service-provider community tend to generate a variety of resources and support in their efforts to serve homeless children and youth. Some of the credit for coordinating and collaborating with the service provider community, however, must also go to the McKinney Act itself. Local school district administrators and shelter providers in our site visit sample reported greater collaboration among service providers since McKinney. As one shelter provider explained: "partnerships are crucial for survival, and McKinney funding has enabled organizations to collaborate and meet; it's put a formal connectedness between organizations." A district coordinator in another state explained that McKinney has helped streamline local efforts to serve homeless children and youth by giving district liaisons some legal leverage to compel schools to recognize their homeless student populations and comply with local efforts to meet their needs:

> [Before McKinney,] shelters and, to a certain degree, school districts and schools worked to provide educational services to homeless children and youth. However, these efforts tended to be isolated and conducted without much communication between players--even those working in a centralized area. Since McKinney, service providers are more likely to communicate, especially because school staffs are now realizing that they have a homeless population with special problems and needs that they must address.

Finally, New York has ensured local coordination and collaboration by requiring that all relevant New York City community school districts use their McKinney Act subgrants to supplement existing services and activities for homeless children and youth. Consequently, community school districts collaborate with a number of community organizations in providing services to homeless children and youth, including several museums (Guggenheim, Children's Museum of Manhattan), an art and dance studio, the Manhattan College Learning Center, the Horticultural Society of New York, and a marionette theater, among others. New York City community school districts, however, can use their McKinney grants in this manner because they already address the issues of identification and tracking, awareness raising, and supplemental instruction for homeless children and youth through other state- and locally funded programs.

Transportation to School

As we discussed in Chapter II, transportation is the biggest state barrier to school access for homeless children and youth. At the district level, the circumstances are no different. Several state coordinators told us that districts bypass the provision of the McKinney Act that requires LEAs to continue a homeless child's or youth's education in the school of origin (if the child or youth so

chooses and it is determined to be in their best interest), particularly when such a placement decision requires transportation services. Given the language of the Act, these LEAs may not believe they are out of compliance, however. According to the Act: "each homeless child shall be provided services comparable to services offered to other students in the school" (including transportation services). If the school of origin lies outside the district boundaries, district administrators may believe that the "comparable services" provision of the Act allows LEAs to avoid transporting homeless children and youth back to their schools of origin[26].

Those districts in our site-visit sample that are able to transport homeless children back to their school of origin benefit from a pre-existing policy, such as desegregation or school choice, that funds the transportation of students across attendance zones within a district. No district in our sample, however, has successfully responded to the McKinney Act when returning homeless students to their school of origin requires transportation across district lines.

McKinney funds and services have helped shelter-based homeless children and youth obtain transportation services to a school, albeit not usually their school of origin. Before McKinney, some homeless students were unable to access any school transportation services. The following are examples of LEAs that have used their McKinney funds, in part, to connect homeless children and youth to available school district transportation services:

Boston Public Schools (MA) used about a quarter of its 1992-93 McKinney subgrant to ensure that homeless students are transported across school zones. Before receiving the McKinney Act funds, the district only provided transportation services to homeless children and youth if they had been identified by the shelter or were self-identified. In addition, many homeless students living out of the appropriate attendance zone could not continue attending their school of origin unless they provided their own transportation. For children and youth placed in hotels or motels located 20-30 miles outside of the city, other than those enrolled in special education programs, district-funded transportation back to Boston Public Schools is not available. These students usually must transfer into a school in the school district where the hotel/motel is located.

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[26] The 1990 law required that "Each homeless child shall be provided services comparable to services offered to other students in the school selected according to the provisions of paragraph (3), including transportation services, educational services for which the child meets the eligibility criteria, etc." [1990 McKinney Act, Section 722 (e)(5)]. The current law, as amended in IASA, is virtually unchanged regarding the comparable services provision: "Each homeless child or youth to be assisted under this subtitle shall be provided services comparable to services offered to other students in the school selected according to the provisions of paragraph (3), including. . . " [1994 McKinney Act, Section 722 (g)(4)].

Baltimore Public Schools (MD) has established lines of communication between the shelter system, the central office, and the school district's transportation department to ensure that homeless children and youth get the transportation services they need. Homeless children and youth are transported to any school within the city of Baltimore. When a new student arrives at a shelter, shelter staff inform the central office, which in turn informs the transportation department. A decision is made on whether an extra bus, cab, or mass transit pass is the most efficient and economical way to meet the transportation needs of the student. No one has yet sought transportation to a school of origin outside of the city; the chief of transportation indicated that the school district would not be in a position to absorb the cost.

Overall, district and state administrators argue that breaking down the barriers of residency, immunization, guardianship, and records requirements rings hollow when homeless children and youth cannot get to school. Nevertheless, transportation is a need that districts are unable to fully meet given the constraints of the 50/50[27] provision of the McKinney Act and the constraints of their own district budgets. Moreover, districts have not committed sufficient resources to transport students to school. When asked why other agencies within school districts could not supplement the costs of transportation, district-level officials explained, almost without exception, that in this time of budgetary cutbacks, no agency had the resources to spare.

In the few cases in our site-visit sample where districts tried to leverage resources from other programs or agencies, they were stopped. For example, in one urban district, the school bus drivers' union blocked the school district's attempt to use part of its McKinney grant to hire a private service to transport children and youth from hotels and motels outside of the city to school. The union claimed that the school district was introducing unfair competition and that if it proceeded, the union would strike. The union, however, offered to transport the children to school from the hotels and motels for $25,000 per required bus. Given that the children in hotels and motels are spread across a wide radius around the city and attend different schools starting at different times, one school bus could not guarantee that children would arrive at their home school on time. The union's counter proposal would cost the school district far more than $25,000, thus making the venture unaffordable.

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[27] Formerly, section 723(b) of the McKinney Act required LEAs to spend 50 percent of their McKinney grants on direct educational services and between 35 and 50 prcent of the remaining funds on indirect educational services and activities such as transportation or referrals to medical services.

Recent amendments to the McKinney Act, however, eliminate these requirements regarding resource expenditures. LEAs may now expend subgrant funds on any activities to carry out the purpose of the Homeless Children and Youth Program [Section 723 (d)].

Identification and School Placement of Homeless Children

Most McKinney subgrantees devote time or resources to the task of identifying and placing homeless children and youth in school. In Madison Metropolitan School District, for example, the liaison for homelessness issues talks with parents in the shelters, and helps them fill out school enrollment forms and make school placement decisions. Similarly, in the Minneapolis Public School district, the liaison is stationed in the shelter where he identifies and places homeless children in school and monitors their school attendance.

Other McKinney subgrantees in our sample, however, rely on personnel funded by the school district or state, rather than McKinney-funded staff, to identify and place homeless children and youth in school. For example, New York's Attendance Improvement/Dropout Prevention (AIDP) program funds the placement of at least one district employee (referred to as a family assistant) in all the shelters, hotels, and motels serving homeless families living in New York City. When a family with school-age children enters a shelter or other temporary housing facility, a family assistant completes a school notification form with the help of the parent(s) or guardian(s). In addition to a student identification number, the notification form includes information about whether the parents or guardians have decided to have their children remain at their current school or transfer to the school zoned for their temporary housing facility. The family assistant is also responsible for monitoring the attendance of homeless children and youth. Like many of the McKinney-funded district liaisons and school- or shelter-based facilitators, family assistants also help homeless students obtain immunizations and transportation assistance.

Shelter providers play a crucial role in the identification and school placement of homeless students. In Minneapolis, for example, they give the liaison an office in the shelter. In addition, as part of the intake process, these shelter providers direct all incoming families with school-age children to the liaison's office for assistance with school-related matters. Shelter providers' attitudes toward school are also important to the continued school attendance of homeless students. Liaisons told us that where shelter rules are lax, homeless students may not attend school:

> We have personnel who try to make sure that students attend school, but we need assistance from staff at the shelters. The philosophy of the people running a shelter affects whether the children and parents living there are serious about education.

According to the liaisons in our site visit sample, despite occasional problems, shelter providers generally support the efforts of districts to ensure the school access and attendance of homeless children.

Parent Involvement

Homeless parents sometimes create barriers to school enrollment and attendance for their children. Parents typically want their children nearby throughout their homelessness crisis and may thus be averse to enrolling them in school. Some parents who are homeless may only be willing to send their children to schools in close proximity to the shelter. One homeless liaison explained that most parents view the schools as a threat to the survival of their family:

> [Homeless] parents won't send their children to school; they fear that the child service agency will take their children away because their clothes are dirty or because they are not appropriately dressed or lack school supplies.

Other homeless parents keep their children out of school because they think their situation is temporary, and they will soon return to their homes.

Recognizing these problems, many McKinney subgrantees try to find ways to ease parents' fears. Madison Metropolitan School District, for example, tries to bring parents and their children into the schools by enticing them with such living essentials as clothing, underwear, tennis shoes, school supplies, and hygienic supplies. Once parents arrive at the school, school staff help them fill out forms and ensure that they are comfortable with the school and the services it offers. According to the school staff, this strategy has been fairly successful: both students and parents are coming to school. In New York City community school districts, teachers and parents attend parent-involvement workshops at temporary housing facilities. Their hope is that, through these contacts, parents may develop better relationships with teachers and principals and thereby have greater confidence in sending their children to school. As one district coordinator commented, "This is very important. It's crucial for parents to have someone that they're familiar with in the schools [to guarantee the enrollment and attendance of their children]." Many parents have gotten to know teachers and principals at these meetings; school enrollment and attendance in this district have also improved.

Even once children are enrolled in school, however, parents' attitudes toward education may still pose a barrier to the educational success of their children. Some homeless parents are much too preoccupied with more pressing issues such as trying to find shelter, jobs, food, or drug treatment to put aside the time for school-related activities with their children. Nevertheless, school districts encourage parents to participate in a variety of education-related activities in an attempt to help them set an example for their children regarding the value of education. Through participation by homeless

parents in programs for GED preparation, adult literacy, or continuing education, schools hope to raise the interest of their children in school. The following are some examples of the types of parent-involvement activities that McKinney funds support in school districts:

> The **Seattle School District (WA)** invites homeless parents to work with students in the classrooms and to volunteer on the playground and during after-school programs. The objectives are to allow students to see their parents in different roles and allow the parents to work with their children. Case managers work with homeless students and their parents and connect the family with the social services needed for the family to obtain and sustain housing. The case managers in each of the five designated schools serving homeless children link parents with continuing education programs, drug rehabilitation programs, and clothes banks, as well as assisting them in obtaining credit information and legal assistance.
>
> Some of the McKinney-funded community school districts in **New York City (NY)** use their grant money to fund activities for homeless parents, including vocational counseling, literacy training, conflict resolution training, stress management, and mental health counseling.

In proving the Access of Homeless Children and Youth to Educational Programs and Services

Some McKinney subgrantees in our site-visit sample reported making an effort to ensure access to Chapter 1 services among eligible homeless children. By using Baltimore Public Schools' computerized tracking system, for example, the Chapter 1 coordinator can ensure that students continue to receive Chapter 1 services when they move from a schoolwide Chapter 1 program to a Chapter 1 school with targeted services. The Dallas Independent School District ensures that eligible homeless children receive Chapter 1 services by assigning the same person the task of coordinating both the district's Chapter 1 and McKinney-funded programs.

Despite their efforts regarding Chapter 1, however, districts are largely failing to ensure the access of homeless children and youth to other services and programs such as special education, programs for students with limited English proficiency, and Head Start. Reflecting the lack of intensity at the state level (discussed in Chapter III), few subgrantees in our site-visit sample reported expending much effort on monitoring the access of homeless children and youth to other educational programs and services. When asked, district administrators in our site visit sample argued that homeless students have the same access to educational services and programs as any nonhomeless student. However, treating homeless children and youth "just like everyone else," as one district-level official described it, is not always acting in their best interest. For example, programs with limited enrollment slots that tend to fill up at the beginning of the year are usually unable to serve children who arrive later in the year.

Regarding special education, some local school districts have anywhere from 45 to 90 days to transfer special-education records or assess students' needs. This process is much too long for a highly mobile student who may change schools several times during the period allowed for assessment or records transfer; as a result, homeless children and youth are not properly served. Legal advocates in one school district say that special education is the big hole in that district's services system for homeless children and youth: these youngsters often fail to receive the services for which they are eligible because they frequently lack special-education records. An official in another school district argues that the solution to the records problem is to develop a quicker assessment system:

> We can't wait five weeks before appropriately placing a homeless child. By the time the results [of the assessment] are known, kids have transferred to another school. The process needs to be expedited for homeless students to better serve them.

The school districts that appropriately and quickly place homeless students in special-education programs have assigned responsibility to a school administrator for the prompt acquisition of school records. The problem of lengthy assessment periods still exists, however, for homeless children and youth for whom school districts lack assessment records. Moreover, district administrators caution that abridging or side-stepping educational assessments could lead to even bigger problems. Such solutions might lead to inappropriate diagnoses and program placement, as one district coordinator suggests:

> Some homeless children and youth do not achieve grade level because of the chaos in their lives or repeated absences; but they are not necessarily in need of special education. It can be difficult to distinguish special-education needs among this population.

Some district coordinators, in fact, fear that a disproportionately high number of homeless children and youth may already be inappropriately identified as needing special-education placements.

Other Subgrantee Services and Activities

Immunizations and other health care services. Most subgrantees in our site-visit sample reported that homeless children generally have no trouble enrolling in school because of immunization requirements: they receive the immunizations and other health care services they require. Most reported that shelters now have health-care clinics or efficient referral systems that ensure homeless children and youth get the health-related services they require. Few LEAs in our site visit sample reported expending much, if any, McKinney funding on obtaining immunizations for homeless children and youth.

School supplies. According to the survey of state coordinators, many subgrantees (25) expend McKinney funds on school supplies. In our site visits, liaisons for homelessness issues explained that a small percentage of their McKinney grants goes to purchase books, paper, pencils, backpacks and other school supplies for homeless children and youth living in shelters. The liaison for Boston Public Schools uses a small percentage of McKinney funds each year to provide another five to six shelters with play spaces for the children living there. Stocked with toys, educational equipment, and books, the play spaces are used for recreation activities and for doing homework. As mentioned earlier in this chapter, Madison Metropolitan School District provides school supplies and other living essentials as an incentive to parents to bring themselves and their children to school.

State Support of McKinney Subgrant Projects

With limited time and resources, most state coordinators target their monitoring activities to LEAs that have received McKinney subgrants. Few of the state coordinators interviewed, however, said they use the monitoring data for punitive purposes such as discontinuing grant awards to LEAs that failed to provide necessary services and activities for homeless children and youth. Moreover, we learned in site visits that few state coordinators require McKinney subgrantees to assess their project services and activities. Consequently, few subgrantees in our site-visit sample could discuss the degree to which their projects improved the school access, attendance, and success of homeless children and youth.

Among the McKinney subgrantees in our site-visit sample, most were quite satisfied with the support the state coordinator provided. One liaison for homelessness issues described his state homeless coordinator as doing an "excellent job" of keeping in close contact with him. A liaison in another state said her state coordinator "provides good guidance. She visits the sites; she knows what's going on." Liaisons in our site visit sample said support from the state coordinator usually comes in the form of information and materials that help subgrantees provide services. Besides making regular visits to school districts and convening annual or biannual subgrantee meetings, state coordinators disseminate information and materials to subgrantees that may include: (1) research on homelessness, (2) self-assessment guides, (3) information on funding changes and legislative activity, (4) proposal support, or (5) information on additional funding opportunities available in the state or district.

Most subgrantees value their state coordinators' efforts to: settle disputes among schools and school districts about school access issues; identify gaps in local services to homeless children and youth; keep subgrantees current on legislative and funding issues that affect the education of homeless

children and youth; and review and revise state policies that impede homeless students' access to school. In general, however, few subgrantees depend on the authority of the state coordinator to accomplish the tasks required under the grant.

V. ADDITIONAL CHALLENGES TO STATE AND LOCAL EFFORTS TO MEET THE EDUCATIONAL NEEDS OF HOMELESS CHILDREN AND YOUTH

Translating federal policy into state and local practice is an imperfect process. Overall, as the survey data attest, state coordinators have done a good job of identifying and attending to policies and regulations that bar homeless children's and youth's access to school. Nevertheless, despite the work of state coordinators and their district counterparts to eliminate barriers that impede school access for homeless children and youth, many challenges remain. Old barriers still exist, and new ones are emerging.

In this chapter, we describe additional challenges to state and local efforts to ensure homeless students' receipt of a free, appropriate education. Some of these result directly from federal, state, or local inaction or lack of awareness about policies that impede school access and success for homeless students. Others emerge from the policies of government agencies and organizations that deal with housing, welfare, and other social services. Still others result from the behavior of families that are homeless. Where possible, we present examples of state and local efforts to work through--or around--these challenges.

Special Schools for Homeless Children and Youth

According to some practitioners, one of the drawbacks of having so many players working on the problems of homelessness is that some may arrive at solutions that are not in the best interest of homeless children and youth. Transition schools, for example, although appealing to many parents who want to keep their children near the shelter and in nurturing environments, are not necessarily the best answer to the educational and social problems confronting homeless children and youth. Transition schools present a barrier to the educational success of homeless children and youth for several reasons: (1) the schools isolate them; (2) the schools disrupt their educational continuity because placement is always temporary, thus guaranteeing a school transfer at some point during or after the shelter stay; (3) the schools may prevent them from accessing mainstream school programs that may uniquely serve a particular need, such as Chapter 1, migrant education, special education, or bilingual education; and (4) the schools often do not follow the district-prescribed curriculum, thus potentially putting homeless students even further behind in their coursework than when they entered the shelter. Although mainstream public schools may not focus as much on meeting the social and

emotional needs of homeless children and youth or provide as much individual attention from sensitive teachers and administrators, public schools can, as one liaison explained, bring a semblance of normalcy to children's lives: "Their lives are disrupted enough. [Homeless children] should be in a place where they have access to the kinds of services and activities that nonhomeless kids have and that they're used to. Their home lives are extremely disruptive and disorienting; why must their school lives be as well?"

In any case, some school districts are providing financial support[28] and sanctioning the placement of homeless children and youth in transition schools. Those who support transition schools argue that very short-term stays can help homeless children and their families. For example, transition schools will work exclusively with homeless children for a few weeks, screening and assessing them to ensure they are placed at the appropriate grade level and offered needed services. Such schools also help parents fill out necessary forms, provide school supplies, counsel family members, and sometimes assist families in finding more permanent housing and employment.

Identification and Placement Issues

Although many LEAs, in collaboration with shelter providers, have done a thorough job of identifying, enrolling, tracking, and serving the homeless children and youth living in shelters, such services are usually not available to those living outside the shelter system. Although they have no formal counts, most local service providers contend that a large number of homeless families are living outside of the shelter system. Data from state status reports show that the number of homeless families living doubled up, for example, constitutes over half of the homeless population in some states. As one liaison for homelessness issues remarked, "If they're not in the shelters, they're effectively not in the system," and thus go without the benefit of state and local services. In addition, most school districts concentrate homeless identification, tracking, and instructional services at the elementary school level; homeless youth rarely benefit from McKinney-funded services and activities.

Another condition that impedes the identification, tracking, and service of homeless children and youth is the fairly common policy, particularly in large cities with large homeless populations, of placing families in hotels and motels when the shelters are full. Such placements obstruct the efforts of social service providers to meet the educational needs of homeless children and youth. For example, hotels and motels, unlike public shelters, generally have no clinic for immunizations and no

[28] Without using McKinney funds.

case workers to ensure that children and youth are enrolled in and attending school. Lacking the rules and resources of the shelters, many children living in hotels or motels do not attend school. A particularly troublesome problem presented by the hotel/motel placement option occurs when the hotel or motel is located well outside the city, thus effectively thwarting any hope of returning homeless children and youth to their home school. In the cities where this situation exists, the school systems have no way of monitoring the enrollment and attendance of children and youth living in hotels and motels; thus, many children and youth go without school. In addition, students with special needs are sometimes placed in shelters without regard to whether local schools will be able to serve their needs. Even rules intended to protect the interests of homeless people can interfere with access to education. Examples are the rules in New York and Massachusetts that ensure rapid provision of shelter to homeless families. While desirable for safety reasons, these mandates often cause families to be moved far from their children's schools. Furthermore, the overwhelming load experienced by both the schools and the shelter system in some areas leaves little time for communication and common planning.

The hotel/motel option is also often used to penalize parents for violating shelter rules. Although the action is targeted at the parents, it most negatively affects the educational progress of their children. In one city, if a family is temporarily evicted from the shelter for violating a shelter rule, the child must transfer to another school in the hotel/motel attendance area. Even though the duration of the punishment is usually only one week, some families choose to stay at the hotel or motel--where there are fewer rules--rather than return to the shelter. Their children therefore no longer benefit from the shelter-based services that help them access the school system, including case workers, attendance monitors, and health-care providers. Further, although in our site-visit sample only the large cities with large concentrations of homeless families tend to use hotels and motels for shelter placements, we found that more and more cities are confronting growing populations of homeless families and are considering using hotels and motels.

Coordination between schools and service providers is especially difficult for domestic violence shelters. For the safety of their residents these shelters keep names and locations secret. Schools need to make special efforts to understand the confidentiality concerns of these shelters and earn their trust before they can work with them to provide education to their young residents. Confidentiality is a concern for many other social service agencies as well. Welfare offices, for example, may be aware of homeless children and youth, but obliged to keep much of their information confidential. In

Massachusetts, a mandate from the governor was necessary to cause the welfare offices to inform schools when children were moved into shelters[29].

Finally, although families encounter few barriers to school enrollment and attendance while living in shelters, barriers arise once the families leave. Children may be excluded from school, for example, because they lack immunization records or other school-related information. Recognizing this problem, some school districts and shelters provide follow-up services to help families access the school system once they move out of shelters and into permanent housing.

The Problems Confronting Homeless Youth

Federal and state mandates that act to directly prohibit homeless children and youth from enrolling in and attending school appear to be rare. However, some recent state-level efforts to curb urban crime or ensure school safety create situations that will impede school enrollment for many homeless youth. Surveys indicate that 60 percent of homeless youth experience violence; many own knives and take them to school because they take all their belongings there or because they want protection. Thus they may run afoul of school policies penalizing students for weapons possession. For example, a Massachusetts law expels students from the public school system for carrying a weapon in school. A proposed new anti-violence initiative in Minnesota would bar children from school if they did not live with their parents. This would directly exclude unaccompanied youth from school attendance, particularly ironic for those who are homeless because they have fled violence from family members. The new law would also expel students with a history of violence. In Texas, at least two cities have passed curfews making it illegal for adolescents to be on the streets during the night or school day. Homeless advocates point out that homeless youth become guilty of a crime simply because they have no place to go. For many unaccompanied homeless youth, their main crime is their homelessness.

Anti-violence legislation aside, locating and serving homeless youth have been particularly difficult for school districts. The lack of continuity in the education of homeless youth is the result of several factors converging to keep them out of the schools. For example, in the states that offer

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[29] The McKinney Act, as amended by IASA, now requires states and McKinney subgrantees to "coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in Section 105 of the Cranston-Gonzalez National Affordable Housing Act to minimize educational disruption for children who become homeless" [Section 722 (g)(9)].

shelter to homeless youth (not all do), shelter placements are usually limited to 30 days. Homeless youth are thus forced to move constantly, as was described in one state's progress report:

> Many youth experience six or seven moves during the year and are subject to state-wide placement depending on the availability of beds. Because of the brief nature of their stay, most do not attend public school but rather depend almost entirely on the resources available on site.

In addition, it can take as many as 29 of the 30 days that youth are in shelters to get their records transferred. Further, due to lack of emancipation laws in some states, students have trouble getting their records transferred without their parents' signature. Also, schools in some states refuse to admit homeless youth, regardless of whether they have been emancipated, due to liability concerns. According to state and local administrators, school principals are unwilling to accept responsibility should anything happen to unaccompanied youth while on school property; consequently, they refuse to enroll them in school. Finally, most schools will not offer partial credit for the time homeless youth do spend in school. Consequently, even after hurdling the many barriers to school access, homeless youth are prevented from earning credit for work completed and thus have little chance of earning a high school diploma.

Recognizing the lack of services available to homeless youth, some states in our site visit sample have begun offering special programs. Minnesota, for example, offers special alternative schools (Area Learning Centers) that provide academic classes built around short-term units (thus accommodating the transiency of homeless youth); students can attend these centers any time of the year, full- or part-time. All credits earned at the centers transfer to school districts. Approximately 10 percent of the students attending the schools graduate each year--an impressive statistic when considering the fact that most homeless youth rarely attend school. The schools emphasize flexibility. For example, students with transportation problems (i.e., transportation is only available within the school district) can take independent study classes. In addition, enrollment in the Area Learning Centers is simple; unlike mainstream high schools, students can bypass district referrals and waiting lists to attend the centers.

Finally, the Iowa state legislature has earmarked $800,000 for a pilot program in four school districts. These Student Based Youth Services (SBYS) projects are designed to help students by coordinating services between the community and the schools, including employment, mental health, family development, and general health services to provide comprehensive "one-stop shopping" for students, particularly those who are at risk. The strong outreach component of these projects for parents and families has increased the number of homeless students receiving services.

Effects of Family Mobility on Educational Continuity

Family mobility is perhaps the biggest factor affecting the educational continuity and success of homeless children and youth. Mobility often results from housing policies that force families out of shelters and into permanent housing before parents are prepared to handle the responsibilities of running a household. Being unprepared, families can fall back into homelessness. A study of homelessness in Minneapolis, for example, found that most families--all of whom must find housing within 30 days of arriving at a shelter--will move twice in the first three months after they leave the shelter. Many district officials talk about the unending cycle of homelessness and how children's lives and education will never stabilize unless states and districts take a long look at the policies contributing to protracted periods of homelessness. Few states or cities, for example, offer homeless parents the assistance, strategies, and support they need to end the cycle of homelessness. One liaison for homelessness issues commented that funding GED, job training, and parenting skills classes might be a good place to start:

> We need to stick with them longer through the process. We can't just find them a home. It is frustrating when we can't provide the services; we feel the crunch of the dollars and we're unable to follow through and serve the families completely. The process does not follow through.

Others recommend offering more transitional or longer-stay shelter programs so that parents can have a chance to address their problems and children can enjoy some stability and continuity in their school lives.

How family mobility affects the educational cohesion and continuity of children's lives concerns several of the district coordinators with whom we spoke. Some have developed short- and long-term means by which to confront the issue. As discussed earlier, several school districts in our site-visit sample have used part of their McKinney subgrants or collaborated with local service providers to provide job training, GED preparation, and parenting skills classes for the parents. Others have attempted to deal with the mobility issue by working directly with teachers and students. Madison Metropolitan School District, for example, has developed a special curriculum for training teachers on mobility issues. An eight-week course taught by McKinney-funded school district staff covers the following issues: (1) the effect of mobility on children; (2) ways to discuss mobility issues with students; (3) social problems caused by mobility, including racism, housing biases, health issues, employment problems; (4) ways to build "classroom communities" to counteract the effect of mobility; (5) ways to slow the rate of mobility; (6) ways to develop a curriculum for mobile and residential students; and (7) children's literature and adult media on mobility. In addition, the

training features field trips and guest speakers that focus on mobility issues. No data on program effects are yet available; the course will be taught for the first time this spring.

Baltimore Public Schools' (BPS) approach to the mobility problem focuses on the student rather than the teacher. Although the approach is untested, BPS administrators believe individualized learning plans may ensure that the educational needs of homeless children and youth are met because such plans will allow homeless students to continue to make progress and develop, even as they move from school to school.

Although these approaches to the mobility issue appear promising, their relatively recent emergence suggests that states and local school districts are only just beginning to address some of the instructional concerns that accompany homelessness. Experiencing success in removing the barriers to school enrollment and attendance, the local school districts have begun, in what seems like a natural progression of concerns, to focus on the issues affecting educational success for homeless children and youth in the light of their psychosocial and educational needs.

VI. CONCLUSIONS AND POLICY IMPLICATIONS

States and local school districts are continuing to work on breaking down barriers that impede school access, attendance, and success for homeless children and youth. Since the McKinney Act was passed in 1987, most states and local school districts have reviewed and revised their laws, regulations, and policies to remove enrollment barriers caused by residency and school records requirements, and more and more homeless students have gained access to school as a result. States and school districts are still struggling, however, to find ways to guarantee homeless students' access to school while still meeting immunization and guardianship requirements; they also have difficulty addressing transportation needs. They struggle largely because these issues are sensitive and complicated in that they are related to health, resources, and safety concerns. Other policies that act as barriers, some only recently identified, are particularly complicated in that they lie outside the authority of SEAs, LEAs, and the McKinney Act. Nevertheless, one sign of progress is the very fact that states and local school districts have moved beyond attending to the barriers created by education policies alone and are now looking at other agencies' policies, rules, and regulations as they affect homeless populations.

Overall, state coordinators and local school district administrators have worked hard, with limited staff and resources, to ensure homeless children's and youth's access to a free, appropriate education. Nevertheless, they continue struggling with persistent barriers to school access that have as much to do with problems of individual and institutional perceptions and attitudes as with problems of policy. Most states and districts have had to focus their energies on improving school access and have not turned their full attention to factors that impede school attendance and success for homeless students. Glimmers of activity in these areas, however, suggest that it will not be long before educators and administrators begin tackling the logistical, attitudinal, and instructional issues that impede the attendance and school success of homeless children and youth.

To address the educational needs of homeless children and youth, state and local McKinney grantees have provided a range of services and activities. In many states, the coordinator is viewed as the primary source of information and authority on issues related to the education of homeless children and youth. Since the McKinney Act was passed, for example, state coordinators have provided staff development in an effort to reduce the resistance of school personnel to serving homeless children and youth. In addition, state coordinators help coordinate the activities of schools and agencies serving homeless children and youth, identify available services and resources, and communicate this information to those who need it. By promoting coordination and collaboration locally, states have enabled school districts and service providers to stretch their available resources

and thus to better serve homeless children and youth. Similarly, LEAs with McKinney subgrants are able to provide a range of educational and recreational services to homeless children and youth that, in the absence of McKinney dollars, many would be unable to provide. In addition, based on anecdotal information, the instructional and recreational activities subgrantees provide seem to positively affect the attitude and behavior of those homeless children participating. These LEAs' efforts to coordinate and collaborate with service providers have allowed access to additional resources and broadened the cluster of services available to homeless children and youth. McKinney subgrantees also ensure that shelter-based homeless children and youth are identified, enrolled in school, and attending school.

Some issues deserve particular attention as states and local school districts work to meet the educational needs of homeless children and youth. In the following section, we discuss these issues and the lessons they offer for future policies and programs that affect homeless children's and youth's access to a free, appropriate education. We begin with a summary of the recommendations made by state coordinators in the national survey regarding ways to improve state and federal efforts to meet the educational needs of homeless children and youth. The policy implications that follow, however, are based on our analysis of the data collected for this study.

Recommendations of State Coordinators

- State coordinators believe the McKinney Act should allow states and local school districts more flexibility in determining how best to use McKinney resources to serve the identified needs of homeless children and youth. In particular, they would like to be able to devote more McKinney funding to transportation.

- In the view of some state coordinators, U.S. Department of Education reporting requirements for data collection should be the same as those required under McKinney Emergency Shelter grants. Emergency Shelter grants require reporting on students ages 0-6 and 7-17. ED requires numbers broken down by elementary (grades K-6), middle/junior high (grades 7-9), and high school (grades 10-12). Standardizing the reporting requirements would alleviate some of the reporting burdens on states.

- State coordinators want some means by which to enforce local compliance with the McKinney Act.

- State coordinators would welcome more technical assistance on developing strategies to motivate parents to send their children to school regularly[30].

- Some state coordinators suggest making not-for-profit organizations eligible to receive McKinney subgrant awards, either in partnership with LEAs or independently. Many not-for-profit organizations have been serving homeless people for years and are more knowledgeable about homeless people's needs, better equipped, and more committed to serving them than are LEAs.

- One state coordinator wants the McKinney Act to require that states with homeless populations above some minimum number have a full-time coordinator for homelessness issues. Part-time coordinators, particularly those in states with large homeless populations, are often unable to fully meet all the demands of their position as defined by the Act.

Policy Implications

State-Level Issues

Although many states have addressed barriers to school enrollment for homeless children and youth by introducing special policies or accommodations that exempt these youngsters from existing legislative requirements, such solutions often go unheeded--sometimes intentionally--at the local level. Making special exceptions for homeless students, as opposed to introducing laws that exempt all children from particular school enrollment requirements, does not eliminate legal barriers unless awareness is raised regarding the existence of these special policies and the dispensation they afford homeless children and youth. Moreover, homeless children and youth may have difficulty reaping the benefits of these special policies if they are not identified as being homeless or if districts neglect to apply a policy.

By broadening the review process to include the policies of other government agencies, including housing and health and human services, state coordinators--and federal officials--may identify heretofore unknown policies that impede efforts to ensure school access for homeless children and

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[30] The recent amendments to the McKinney Act place greater emphasis on the need to increase parent involvement in the education of their children. Specifically, the Act allows LEAs to use McKinney subgrant dollars to, among other activities, "provide education and training services to the parents of homeless children and youth about the rights of and resources available to such children and youth" [Section 723 (d)(9)].

youth[31]. Program requirements and policies under the purview of different federal and state agencies sometimes directly contradict the requirements of the McKinney Act. The relevant federal departments could help state coordinators and local school district officials lessen the confusion by clarifying which policies and program requirements take precedence in light of the McKinney Act.

A great deal of variation exists among the states in the methods used for identifying, tracking, and determining the needs and condition of homeless children and youth, and in the quality of the data they collect. In particular, although some methods of data collection yield incomplete and generally inaccurate data, several states continue to use them. Examples of such methods are one-night counts in shelters only and longer-term direct counts in shelters only. Given that homeless children and youth may not receive the services and support they need if they go unidentified, state coordinators need technical assistance and training in ways to design and implement effective and efficient systems for data collection[32].

A significant proportion of homeless children and youth experience difficulty in gaining access to federally funded educational services (e.g., Chapter 1, special education, Head Start, etc.). Many state coordinators do not even know whether problems of access to particular services exist. Although states may have policies and laws declaring that access should not be denied, this does not guarantee that homeless children and youth have access to the educational programs for which they are eligible. The relevant federal departments could help state coordinators by providing guidance regarding ways to increase and monitor homeless students' access to federally funded educational programs and services. In addition, federal program guidelines could give priority to homeless children and youth on waiting lists[33].

Compared with younger homeless children, homeless youth receive few McKinney-funded services, yet they face extreme barriers in gaining access to and attending school. Considering the unmet needs of homeless youth when targeting McKinney resources and developing programs, services, and activities for homeless students may help eliminate some of the educational barriers homeless youth confront. In addition, better coordination and collaboration among state and local agencies and organizations working with homeless youth will likely improve the identification and school placement process.

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[31] See note 17 above.

[32] See note 14 above.

[33] See note 19 above.

Most students living in shelters get transported to school; many are not transported to their school of origin, however, due to the costs of transportation across attendance zones or district lines. Although most state coordinators argue that McKinney should allow more flexibility in the way they apportion their McKinney funds--so that they can spend more than 50 percent of their grant allocation on transportation services[34]--states and school districts have not exhausted all other avenues in searching for ways to return homeless students to their schools of origin when it is deemed in the best interest of the child. For example, collaborating with agencies that determine shelter placements may help ensure that school-age homeless students are placed in shelters that are closer to their school of origin, or at least closer to school bus routes or public transportation services. In the event that these options fail, however, complying with the school-of-origin provision of the Act may not be feasible for states and local school districts without additional resources.

Homeless children and youth living within the same state, but in different school districts, often have uneven access to needed educational services. State coordinators could help improve the amount and quality of services schools and districts provide to homeless children and youth if they provided more technical assistance, information on promising or innovative practices, and subgrantee project descriptions to all school districts that serve at least some minimum number of homeless students[35].

Family mobility is perhaps the greatest barrier to school success for homeless children and youth. States and local school districts are only just beginning to look into ways that will allow homeless children and youth to continue to make academic and developmental progress, even as they move from state to state and school to school. Focusing more attention--and McKinney resources--on developing ways to address the issue of family mobility in the light of students' academic progress may help eliminate some of the barriers to school success for homeless children and youth.

Due to time pressures and other administrative responsibilities, many state coordinators allocate little time to working with districts that do not receive subgrants. The current time pressures and responsibilities of most state coordinators severely limit their ability to monitor the progress of individual districts, especially those in remote areas with fewer homeless students. Districts that have not received McKinney subgrants receive much less individual attention and support from the state than do those that receive funding. Knowing their limitations, some state coordinators have negotiated the attachment of McKinney-related compliance monitoring and technical assistance to the

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[34] See note 27 above.

[35] See note 16 above.

work of other organizations and agencies (e.g., through surveys, site visits, or other monitoring and technical assistance activities). This type of inter-institutional collaboration is perhaps the most resourceful means by which state coordinators fulfill their responsibilities to homeless children and youth as currently defined under the Act. State coordinators should more strongly consider the needs of districts that have not received McKinney subgrants when making choices about the allocation of time and resources.

Advisory councils, community focus groups, and task forces are often excellent forums in which to identify gaps in services and barriers that continue to impede access to school for homeless students. Advisory councils, focus groups, and other collaborative bodies could do more, however, to build stronger programmatic linkages among the various agencies and organizations working in the service of homeless children and youth[36].

Local-Level Issues

Awareness raising and sensitivity training are never-ending tasks. As teachers, principals, and administrative personnel enter and leave their positions, liaisons for homelessness issues must regularly visit the schools and inform the current staff of the educational rights and needs of homeless children and youth. Awareness raising and sensitivity training, moreover, are not needs unique to the schools: communities can create barriers to school access and success for homeless children and youth. Subgrantees that raise awareness in communities as well as among schools and school districts may, in so doing, overcome barriers that impede the provision of services to homeless children and youth. It is important to note, however, that LEAs without subgrants tend not to have designated liaisons for homelessness issues. In these cases, it becomes crucial to the well-being of homeless children and youth that the state coordinator play the role of liaison and sponsor necessary awareness raising and sensitivity training for school personnel. Indeed, many school officials still do not believe homeless families reside in their communities and consequently offer no special accommodations or services to homeless students or their families.

A host of agencies serve homeless people, and it takes time to identify all the players. Finding a district liaison for homelessness issues who knows and can coordinate with the service-provider community can save time in launching school district efforts to meet the needs of homeless children and youth.

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[36] See note 17 above.

By raising the awareness of relevant Chapter 1, Head Start, special education, and other education program coordinators regarding the needs of homeless children and youth, more homeless youngsters may gain access to the educational services for which they are eligible.

The absolute number of homeless children and youth who are benefiting from McKinney-funded special programs and services is probably not great. More districts with homeless populations need to be made better aware of the educational needs of homeless children and youth and receive adequate support from the state in order to ensure that more homeless students obtain a free, appropriate education.

A district liaison for homelessness issues can be an invaluable agent for ensuring school access for homeless children and youth at the local level. In those districts that have them, liaisons have generally improved the provision of services to homeless children and youth and helped ensure homeless students' access to and attendance in school. By negotiating the network of local agencies and social service providers that make up the system of services for homeless children and youth, liaisons have helped ensure that local services are not duplicated and that homeless students are quickly identified and placed in school. Federal, state, and local officials should weigh the value of liaisons against other McKinney-funded services and activities to determine the relative costs and benefits of each in relation to the goal of ensuring the access of homeless children and youth to a free, appropriate education. Funding liaisons for homelessness issues at the local level may be the best and most efficient use of McKinney dollars.

Evaluation can yield important information about project successes and needs and thereby generate more support and resources from policymakers and program administrators. Few LEAs with McKinney subgrants, however, measure program impacts on the academic achievement, attitude, self-esteem, and school access and attendance of homeless children and youth; most would probably benefit from more technical assistance in program evaluation.

School districts' low-level effort to transport homeless students to their school of origin--when it is deemed to be in a student's best interest--suggests that the language of the McKinney Act may be unclear. Local school district administrators may view the reference to the "comparable services"[37] condition in the law as justification for refusing to transport homeless children and youth to their school of origin, particularly when it would require transporting these youngsters across district lines.

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[37] See note 26 above.

The homelessness crisis can affect parents in ways that make them want to keep their children nearby. In fact, parents often fear schools as threats to family survival--they sometimes believe that schools will report their living situation to a child service agency that would subsequently take their children away--and often do not encourage their children to attend while they are homeless. Sponsoring parent-involvement can be extremely important to the success of local efforts to ensure school access, attendance, and success for homeless children and youth.

Issues for Agencies Outside Education

Families placed in hotels and motels have access to fewer services (e.g., case workers, health care clinics, etc.) than are available in shelters and other temporary housing facilities. Housing authorities need to be made aware of the importance of considering the educational needs of homeless children and youth when making housing-placement decisions. In particular, in the case of special needs students (e.g., with physical or learning disabilities), housing authorities must consider whether local schools can serve the students' needs. This issue requires some coordination at both the state and local level with regard to housing policies and educational needs[38].

State government agencies and nongovernmental groups and organizations can provide a great deal of assistance to the office of the state coordinator. These bodies can provide information on needs and conditions of homeless children and youth in the state and help define the coordinator's agenda for meeting the educational needs of homeless children and youth within the broader frame of relevant state agencies and organizations, program rules and regulations, working to serve the needs of homeless people.

Shelter providers can support the efforts of school districts to identify and place homeless children and youth in school by allowing a district representative--where there is one--to work directly in the shelters. In addition, shelter providers help ensure the continued school attendance of homeless students by setting rules and conveying a positive attitude regarding regular school attendance.

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[38] See note 29 above.

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